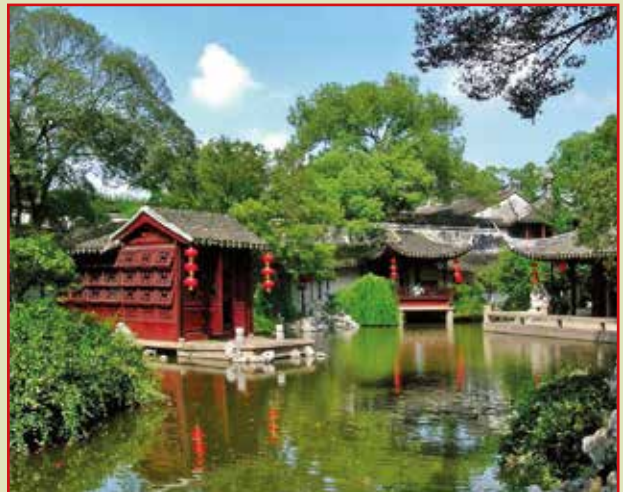


WORLD HERITAGE WATCH

10th
anniversary
edition

World Heritage Watch Report 2024



World Heritage Watch

**World Heritage Watch
Report 2024**

Berlin 2024

Bibliographical Information

World Heritage Watch: World Heritage Watch Report 2024. Berlin 2024
 228 pages with 296 photos, 30 graphics and 52 maps in 55 contributions
 Published by World Heritage Watch e.V.
 Berlin 2024

ISBN 978-3-00-079183-3

NE: World Heritage Watch

1. World Heritage 2. Civil Society 3. UNESCO 4. Heritage at Risk 5. Natural Heritage 6. Cultural Heritage 7. Historic Cities 8. Sites 9. Monuments 10. Cultural Landscapes 11. Indigenous Peoples 12. Participation



WORLD HERITAGE WATCH

© World Heritage Watch e.V. 2024

This work with all its parts is protected by copyright. Any use beyond the strict limits of the applicable copyright law without the consent of the publisher is inadmissible and punishable. This refers especially to reproduction of figures and/or text in print or xerography, translations, microforms and the data storage and processing in electronic systems.

The designations employed and the presentation of the material in this publication do not imply the expression of any opinions whatsoever on the part of the publishers concerning the legal status of any country or territory or of its authorities, or concerning the frontiers of any country or territory.

The authors are responsible for the choice and the presentation of the facts contained in this book and for the opinions expressed therein, which are not necessarily those of the editors, and do not commit them.

No part of this publication may be reproduced in any form without written permission from the publishers except for the quotation of brief passages for the purposes of review.

No part of this publication may be reproduced in any form without written permission from the publishers except for the quotation of brief passages for the purposes of review.

Editorial Team

Stephan Doempke (chief editor), Sayali Athale and Zhuo Diao. Map editors: Sayali Athale, Martin Lenk

Cover photos:

Upper left: The Mittelplate oil drilling and production platform is surrounded by the Wadden Sea World Heritage.

Photo: Wintershall Dea / Andrea Frey

Upper right: Tourism infrastructure development of gigantic proportions within the St. Catherine Area World Heritage, Egypt. Photo: Anonymous

Lower left: Protesters warn the zipline planned to run from Rio de Janeiro's Sugarloaf Mountain to Morro da Urca could harm the local environment and wildlife. Photo: Carl de Souza / AFP

Lower right: The Lingering Garden, one of the Classical Gardens of Suzhou, China. Photo: <https://nuvomagazine.com/whats-new/the-gardens-of-suzhou>

Back cover map: Martin Lenk

Cover Design: Bianka Gericke www.layoutmanufaktur.de

Design and layout: Bianka Gericke www.layoutmanufaktur.de

Printed by: Buch- und Offsetdruckerei H.Heenemann GmbH & Co. KG, Berlin

Contents

Preface	7
Maritta von Bieberstein Koch-Weser and Stephan Doempke	
Dr Kate Fielden 1944 – 2023	9
by Tom Holland ¹	
I. Monuments and Sites	11
The Fate of Stonehenge is still Hanging in the Air	12
John Adams with Kate Freeman, The Stonehenge Alliance	
Abusive Planning Application within UNESCO Buffer Zone of the Ġgantija Temples	15
Joerg Sicot, Flimkien għal Ambjent Aħjar	
The Acropolis of Athens: A Story of Arrogance and Fallacy	17
Tasos Tanoulas on behalf of Hellenic ICOMOS and SOS Acropolis	
The Expansion of Catholic Iconography in the Mosque-Cathedral of Cordoba	23
Vanesa Menéndez Montero	
Visitor Management Issues of the Hagia Sophia Indicate That it Should Have Remained a Museum	26
Anonymous author	
The Monastery of Chora in Istanbul and the Role of UNESCO	31
Helen Methodiou	
Tauric Chersonesos is being Destroyed by the Occupying Russian Authorities	34
Evelina Kravchenko	
Community Management After Recent Damages at Petra Archaeological Park, Jordan	39
Maria Elena Ronza and Samah Jazi Faisal Al Khasoneh, Sela for Training and Protection of Heritage	
What do we Know About the Sites on the Tentative List for World Heritage in Gaza?	42
The Destruction of the St Catherine Area, South Sinai, Egypt	47
John Grainger, Joseph Hobbs, Mohammed Sabry and others	
The World Heritage Sites in Sudan are Under Attack	54
Awad Abdalla Masaoud, Sudan Cultural Heritage Relief	
Cultural Heritage Damaged from Warfare in Tigray Regional State, Ethiopia	56
Isber Sabrine, Heritage for PeaceAtsbha Gebreegziabher, Tigray Culture and Tourism Bureau	
Recent Findings on Forced Evictions Taking Place at Angkor, Cambodia	62
Amnesty International	

II. Historic Cities and Urban Ensembles

69

St. Petersburg: Destruction of Monuments at the Okhta Cape has Begun	70
Anonymous authors	
Monument Protection Obstructs Climate Protection at the Waldsiedlung Berlin-Zehlendorf	74
Ute Scheub, Parrot Estate Association	
Goslar – A World Heritage Site Between Self-abandonment and Decay	77
Henning Frase	
Plans to Damage the Integrity of Vienna’s Historic Centre Continue	81
Herbert Rasinger, Initiative Stadtbildschutz	
Venice has no more time.	84
Jane da Mosto, We Are Here Venice	
Safranbolu Municipality Plans to Open Natural Areas to Construction.	85
İbrahim Canbulat, M. Arch.	
Destructive Development at Hebron / Al-Khalil Old Town Site’s Core and Buffer Zones.	88
Alon Arad and Talya Ezrahi, Emek Shaveh	

III. Cultural Landscapes and Mixed Properties

93

The Intended Zipline on Rio de Janeiro’s Sugar Loaf Mountain Remains Strongly Contested	94
André Ilha, Grupo Ação Ecológica (GAE)	
New Construction at the Curonian Spit Threatens its Outstanding Universal Value.	99
Ecodefense!	
Motorised Use of Green Lanes in the Lake District Continues After UNESCO Decision.	103
Lake District Green Lanes Alliance	
Prosecco Hills: Deforestation and Earthworks Continue Even Five Years After Inscription	105
Gianluigi Salvador, Pesticide Action Network Italy	
Austria and Hungary Continue to Threaten the Fertő / Lake Neusiedl Cultural Landscape	108
Zoltan Kun, Friends of the Fertő Lake Association	
Disillusionment and Decay: Time Ticks Out for the World Heritage Convention in Ohrid.	111
Daniel Scarry, Ohrid SOS	
Diyarbakır Fortress and Hevsel Gardens Cultural Landscape Monitoring and Evaluation Report	115
Nevin Soyukaya, Samet Uçaman, Ferit Kahraman, Pınar Can, Mahmut Özkeskin, Zeki Kanay and Jiyān Aydın for the Diyarbakır City Protection Platform (DCPP)	
Construction of Illegal Israeli Outpost Damages the WHS of Battir	120
Alon Arad, Emek Shaveh	

Environmental and Socioeconomic Challenges of the Al-Hawizeh Marshes	127
Salman Khairalla, Save the Tigris	
Threats to the Cultural Landscape and Archaeological Remains of the Bamiyan Valley	129
Abdurrahim Ahmadi	
Access to Monitoring and Reporting: A Case Study from the Classical Gardens of Suzhou	132
Anonymous author	
Cornering the Subak: Threats from Development Planning in Bali’s Cultural Landscape	135
Wiwik Dharmiasih, Yefta Sutrisno, I Gede Yudha Bhismaya, Ni Luh Emi Dwiyaniti	
Constant Vigilance Required in the Tasmanian Wilderness	138
Jimmy Cordwell and Alice Hardinge, The Wilderness Society	

IV. Properties with Indigenous Peoples **141**

A Review of the 2022 Reactive Monitoring Mission to Wood Buffalo National Park	142
Braya Quilty and Carmen Wells, Fort Chipewyan Metis Nation	
Major Progress and a Remaining Threat for the Protection of the Grand Canyon	145
Günter Wippel, uranium network	
Continued Request to Inscribe El Pinacate on the List of World Heritage in Danger	149
Alejandro Olivera, Center for Biological Diversity	
Canaima National Park: Rising Threats and no Response from the Venezuelan State	152
SOS Orinoco	
Statement on Lake Bogoria from the Endorois Indigenous People of Kenya	156
Endorois Welfare Council	
Update on the Eviction of the Maasai Population from the Ngorongoro Conservation Area	157
Anonymous author	
ReconAfrica and Namibia are ignoring all international decisions: Drilling to continue in June 2024	161
Andy Gheorghiu, Saving Okavango’s Unique Life (SOUL) Alliance	

V. Natural Properties **163**

More Action Needed for the Islands and Protected Areas of the Gulf of California	164
Alejandro Olivera on behalf of the Center for Biological Diversity, Animal Welfare Institute, Natural Resources Defense Council and Environmental Investigation Agency	
The Galapagos Islands Fulfill the Criteria to be Included on the List of World Heritage In Danger	167
Alejandro Olivera, Center for Biological Diversity	
Tourism Pressures Undermine Protection of the Mosi-oa-Tunya / Victoria Falls	171
Anonymous author	

Demand for Energy Puts the Wadden Sea at Risk	175
Deutsche Umwelthilfe, Aline Kühl-Stenzel, Naturschutzbund Deutschland, Frank Petersen, Waddenvereniging, Hans-Ulrich Rösner, WWF Deutschland	
Spring Rains and Paper Plans are not Enough to Save Doñana from New Threats	179
Teresa Gil Gil and Juanjo Carmona, WWF Spain	
Challenges and Uncertainties Continue for the Aeolian Islands' World Heritage Site	181
Francesco Vettore, Claudia Romagnoli, Pietro Lo Cascio	
The Western Caucasus Remains One of the Most Threatened Sites	185
Anonymous authors	
Legal Obstacles to the Implementation of the World Heritage Convention in the Kazakhstan	189
Valeriy Krylov, Sergey Kuratov and Nataliya Medvedeva, Ecological Society "Green Salvation"	
Imminent threats to the Western Tien Shan in Kyrgyzstan, Uzbekistan and Kazakhstan	192
Rivers Without Boundaries	
Rogun Hydropower Project Threatens Tigrovaya Balka in Tajikistan.	196
Eugene Simonov, Rivers without Boundaries Coalition	
Chronic Mismanagement and Weakened Protection of Lake Baikal	200
Eugene Simonov, Rivers without Boundaries	
"Volcanoes of Kamchatka" has a Chance to Restore its Protection Status	203
Anonymous authors	
UNESCO / IUCN Must be Involved in the Sundarbans Strategic Environmental Management Plan	205
Sharif Jamil and Sultana Kamal, National Committee for Saving the Sundarbans (NCSS) and Dhoritri Rokhhay Amra (DHORA)	
Northern Okinawa: A Review of Japanese and U.S. Measures of Conservation is Urgent	207
Masami Mel Kawamura, Informed Public Project, Hideki Yoshikawa, Okinawa Environmental Justice Project	
The Great Barrier Reef: Australia's Ongoing Climate Mitigation Failures	212
Noni Austin, Earthjustice	

Preface

This is the 10th edition of the annual World Heritage Watch (WHW) Report since we started our work in 2014. Our global network has since grown to more than 200 civil society actors in more than 60 countries. The World Heritage Watch Reports have become more voluminous over the years, reaching 55 contributions this year.

Every year, the World Heritage Watch Report is the same, yet also different. Sometimes there is a preponderance of natural sites, sometimes one of cultural sites. Last year, we had to give special attention to damages from a natural disaster, the earthquake in Turkey and Syria. This year, our attention has been drawn to the wider area of what is often called “the Holy Land” in the Middle East. The horrendous destruction of cultural heritage in Gaza has been widely reported. But there has been destruction of mankind’s common heritage also in sites on the West Bank, in Jordan, and on the Sinai Peninsula of Egypt.

At the same time, internal warfare further south threatens World Heritage sites in Sudan, and it has led to widespread destruction of sites on the Tentative List in the Tigray State of Ethiopia, far from the eyes of the world’s attention, reminding us again that armed conflict, when it occurs, is still one of the biggest threats to both cultural and natural heritage. Nobody seems to be able to prevent the crimes committed in such conflicts, and World Heritage Watch can report about them only when the damage is done and priceless heritage is gone forever.

Is our voice at least heard by those who are in charge of World Heritage, and if so, does it trigger action? Honestly, in most cases we do not know. For us, it is of greatest concern that a rich and powerful member of the World Heritage Committee claims not to have sufficient information about the damages to a World Heritage Site about which we have reported almost every year since we started. Who then takes note of our reports? What impact do we have? To which extent, if any, are alerts taken into account for the Decisions drafted by the World Heritage Centre? Again, we have information on some, but not others.

Disequilibrium is another concern. We are alerted, and alert to threats and dangers to natural sites in remote places that may be lost forever without anyone even taking notice, such as in Central Asia. Meanwhile the biggest threat to all World Heritage sites, climate change – is affecting ever larger parts of the Great Barrier Reef. But while this may make the news for a few days, we do not see the follow through urgently needed. Has the world at large already tacitly accepted the fact that such great places might be lost?

World Heritage Sites have been listed to be protected “forever”, in perpetuity. To live up to that challenging mandate, learning and adaptations over time are essential. For now, however, many cases painstakingly documented in our World Heritage Watch Reports may be noted, but no appropriate action is taken. The opportunity offered by the 50th anniversary of the World Heritage Convention to make it fit for coming decades has been missed: We are still waiting for a concerted process of learning and systemic improvements. Among others, the detailed and constructive suggestions made by the WHW network in our Potsdam Papers for improving the efficiency of the World Heritage Convention remains without response.

People care for their World Heritage. This is why we continue to bring their concerns to the attention of the world public. Our hopes are set on those willing to listen and to act. We hope more engaged State Parties than at present will agree to serve on the World Heritage Committee. We hope for leadership ready to truly protect heritage without prioritizing their respective national or geo-political interests.

This year, reading the report, frustration with the current UNESCO process is in your eye, especially in three of our network members' reports. How can we create a stronger dynamic for the respect and protection of our heritage? From two of our network members, you can glean their frustration with the UNESCO system in this volume, a third one refrained from even providing a written report. None of the three are in developing countries – they are all in Europe. Others contributed their reports without having hope for change. More and more, for safety reasons, authors opt to write anonymously, and some have left their homeland for fear of being detained or silenced should they speak out.

At World Heritage Watch, we continue to feel strongly about our mission. We believe that implementation of the Convention in perpetuity, site by site, depends to a large extent on the commitment of the broader population, on civil society. The positive evidence is there, alongside the shortcomings we demonstrate and deplore. Indeed, people do make a difference. Civil society action has managed to stop damages before it was too late. Early diagnosis, nipping destruction in the bud - for instance by identifying infrastructure plans that would, if realized, damage World Heritage are our forte.

After ten years – a mere ten years, it seems – our anniversary is a time to take stock and ask hard questions, about ourselves, about UNESCO and its State Parties, and best ways to heighten public attention. The idea that each of us considers the World Heritage to be the common heritage of all of us, and that each of us stands up for all of it, is a most beautiful and indeed cosmopolitan concept, that has a potential to bring people from all over the world together, transcending nationalities and religions.

The global World Heritage Watch network is living proof of this. We demonstrate every day that it is possible to create enthusiasm for this beautiful idea, and that we can turn this enthusiasm into action. We are convinced that the World Heritage is an asset for the future as much as it is a gift from the past.

Our 10th anniversary is also an occasion to give special thanks to two persons who over all these years have helped make the WHW Report what it is. First, Bianka Gericke, our computer designer; she has provided the layout and design of all of our publications, working herself through texts and illustrations from incredibly diverse sources with immense patience and diligence while giving the publication its elegant and unmistakable appearance. Second, Martin Lenk; he has contributed many of the detailed and aesthetic maps that would make any geographic publisher envious, including UNESCO itself. To both of them we owe more than we can express, and we hope that they will be with us for a long time to come.

Maritta Koch-Weser, President
Stephan Doempke, Chair
World Heritage Watch



Dr Kate Fielden 1944 – 2023

by Tom Holland¹

Kate Fielden, who has died aged 79 after a short illness, was many things – an archaeologist, an editor, a curator – but to me she seemed almost a tutelary deity: the guardian spirit of Wiltshire’s ancient places, keeping watch over some of Britain’s most sacred landscapes.

I first met Kate in 2015, when she invited me to become president of the Stonehenge Alliance, a group opposed to destructive road developments in the Stonehenge landscape, and of which she was the leading light. She was the gentlest, politest, most self-effacing of women; but she was also the steeliest, the most formidable, the most forensic in defence of what she thought needed defending. As president I was only ever the merest figurehead; it was always Kate who was the doughtiest in fighting the good fight.

The oldest of the five children of Rosemary (nee Hinchcliffe) and John Fielden, Kate was born in Oldham, but during her childhood the family moved to the North Downs in Kent. Her father worked for a tea-importing business, her mother as a school secretary. Although a scholarship girl at Walthamstow Hall in Sevenoaks, on leaving school Kate did not initially go to university, but joined the Royal Navy, then worked as a teacher at Bayham Road primary school in Sevenoaks.

Only in 1965 did she go to SOAS in London to study archaeology. Kate’s initial focus was the ancient near east – she spent the late 1970s in Syria – but in due course, after obtaining her doctorate at Oxford, she came to devote herself instead to the archaeology and wildlife of Wiltshire. Settling in the Vale of Pewsey, surrounded by neolithic earthworks and long barrows, tending her garden, she had found her great mission in life: to help preserve the wonders and beauties of her adopted county.

For 28 years from 1985, Kate worked as the curator and archivist at Bowood House, the Georgian house in north Wiltshire famous for its gardens landscaped by Capability Brown. Simultaneously, she was becoming a seasoned activist. She campaigned successfully against obtrusive developments near Avebury; played a leading role in Rescue: The British Archaeological Trust; and was an award-winning activist for CPRE, the countryside charity.

Her greatest cause, though, and one to which she devoted the final decades of her life, was the campaign – still not won – against the government’s plans for a road tunnel that, if it goes ahead, will desecrate the Stonehenge landscape for ever. In the words of David Jacques, the distinguished archaeologist whose excavations are directly threatened by the development, Kate’s sense of passion was “fierce but quiet, instilling confidence in others, always inspiring people to achieve their best.” All who knew her will recognise the truth of this encomium. She is survived by her siblings, Rowena, Rupert, Sandy and Jim.

This obituary was first published in The Guardian and is republished above with permission.

¹ Tom Holland is a historian and the president of the Stonehenge Alliance.

I. Monuments and Sites

The Fate of Stonehenge is still Hanging in the Air

John Adams with Kate Freeman,
The Stonehenge Alliance



The UK Government's plans for road widening, including a 3.3 km tunnel, across the 5.4 km-wide Stonehenge World Heritage Site (WHS) landscape were approved for a second time on 14 July 2023 by way of a Development Consent Order (DCO). The road proposals as well as the project's progress and implications have been covered in earlier *World Heritage Watch Reports* (2018, 2019, 2021, 2022 and 2023).

Summary of previous developments

In 2020, the Secretary of State for Transport (SoS) approved plans for road widening, despite the Examiners' conclusion that the "effect of the Proposed Development on the OUV of the WHS would lead to substantial harm to the significance of the designated heritage asset..." and that the SoS "should not make an Order granting development consent for the application".

The SoS's decision to approve the scheme was challenged and ruled unlawful in July 2021. Following the quashing of the

scheme's DCO the SoS put in place an onerous process to re-determine the road scheme, asking National Highways (NH) and others for further information. In 2022 interested parties were invited to respond to NH's submissions.

The 17-month long process was in writing, without hearings, unlike the Examination of the draft proposals. There were over 1,500 representations and documents by NH and Interested Parties. Technical submissions covered subjects such as alternatives; hydrology; traffic forecasts; carbon and climate change and environmental impacts, supported by over 20 detailed reports on environmental issues and data documents. Among these reports was the joint World Heritage Centre/ICOMOS/ICCROM Advisory Mission to Stonehenge report published in August 2022. Its main findings and recommendations echoed earlier advisory missions and World Heritage Committee Decisions: profound concern for irreversible impact of the road scheme to the integrity of the WHS and its OUV. The Advisory Mission recommended an alternative route around the WHS or a tunnel beneath the entire length of the WHS.

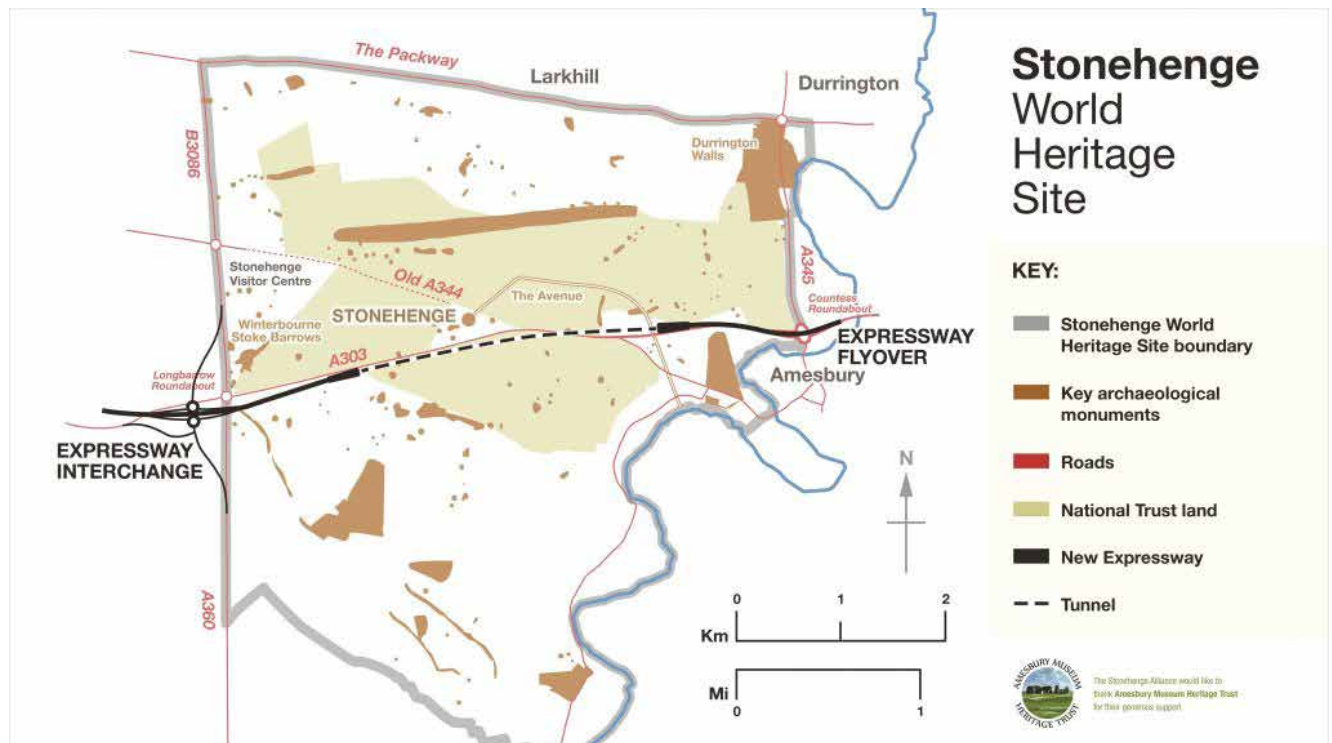


Fig. 1: Map showing how the tunnel isn't long enough to avoid damage to the World Heritage Site.

Map: Courtesy of Amesbury Museum and Heritage Trust

Position in 2023

Keeping abreast of these submissions and responding to them was a considerable undertaking. The Alliance's concern with the redetermination process was the absence of scrutiny by independent experts, a role previously played by the Examining Authority. Thus, the process gave no opportunity for the Alliance, its specialists, or other members of civil society to question National Highways at issue specific hearings, because none took place.

The DCO subsequently granted by the Transport Secretary in July 2023 was essentially for the same road scheme, despite the High Court's ruling in 2021 and its condemnation by the World Heritage Committee, the Advisory Mission's report of 2022, and the Examining Authority that concluded that the adverse impacts would strongly outweigh the benefits.

Save Stonehenge World Heritage Site (SSWHS), a private company set up by supporters of the Stonehenge Alliance to bring the first Judicial Review, maintained its company status to challenge the second decision; a claim was filed with the High Court at the end of August.

The only way SSWHS could afford to bring this second Judicial Review was through crowdfunding to cover its legal fees, and potential costs if the case were lost. A new crowdfunding page was set up with a stretch target of £80,000 pounds sterling. In the event over £83,000 was raised through donations from 2,589 generous individuals.

The legal challenge

- In addition to the claim that the Transport Secretary had acted unlawfully by not reopening the Examination, the basis of the claim was:
- a failure to consider material, including consultation responses.
- the consideration for rejecting alternatives was unlawful.
- the decision was not made in accordance with national planning and carbon policies; and, crucially,
- it was irrational for the SoS to give no weight to the possibility of the WHC delisting the WHS.

The Transport Secretary in his decision letter states (our emphasis):

'Several respondents including the Stonehenge Alliance, the Consortium of Stonehenge Experts, and ICOMOS UK referred to the World Heritage Committee's power to delist properties and referred to the prospect of Stonehenge losing its status. The Secretary of State has taken this issue into account but given it no weight because if it were to happen it would happen as part of a separate process, the Secretary of State

is satisfied that the Proposed Development is in accordance with the NPSNN (National Policy Statement for National Networks) and in granting consent, this would not lead to the UK being in breach of its World Heritage Convention obligations, and the Applicant will be working with advisory bodies when constructing the Proposed Development.' (Para 101)

For this second legal challenge there was an additional claimant: a local resident whose property rights might be subject to compulsory acquisition. Together with SSWHS the claimants jointly pursued the challenge that the failure to re-open the examination constituted a breach of Article 6 of the European Convention on Human Rights (ECHR) and the requirements of due process arising at common law and from the statutory scheme.

Contracts, UNESCO and the World Heritage Committee

National Highways has already let the contracts for this project and has commenced preliminary work adjacent to the World Heritage Site (April 2024), with full-scale construction planned in March 2025. Knowing this construction schedule, and of the imminent threat it posed to the WHS we were concerned that unless Stonehenge was inscribed on the List of World Heritage in Danger at the extended forty-fifth session of the WHC in September 2023, the forty-sixth session might be too late.

In early September 2023, representatives of the Alliance met World Heritage Centre Deputy Director, Ms. Jyoti Hosagrahar and the Head of the Europe and North America Unit, Ms. Berta de Sancristobal, in Paris. The purpose of the visit was to express our grave concern about a further delay to inscribing Stonehenge on the List of World Heritage in Danger, and to present a copy of our petition with its then 225,000 signatures (now 238,000) to make UNESCO aware of the strength of feeling against the Government's road building plans.



Fig. 2: John Adams OBE, Chair of Stonehenge Alliance, presented a scroll with 225,000 petitioners from 147 countries to the World Heritage Centre.

Photo: Stonehenge Alliance

The Alliance made clear that the only thing standing between the WHS and construction starting was the legal challenge. We explained that whilst we welcomed UNESCO's strong line on Stonehenge it was obvious to us that the UK Government had no intention of considering less damaging alternatives. We also wrote to Dr Abdulelah Al-Tokhais, Chairperson of the WHC and copied all Committee members to alert them that Stonehenge WHS was in danger.

We were extremely grateful to the Chair of World Heritage Watch for arranging for a statement from the Alliance to be read-out at the forty-fifth session which included the following: *'We urge the Committee to stand firm in the face of such intransigence and to maintain pressure on the State Party to withdraw the scheme. We will have a new Government within the next 12 months and having a clear and consistent position from UNESCO on the unsuitability of these proposals, should help it come to a better solution and protect the site for future generations.'*

The decision recorded by the WHC at the forty-fifth session includes the following statement: *'12. Finally requests the State Party to submit to the World Heritage Centre, by 1 February 2024, an updated report on the state of conservation of the property and the implementation of the above, for examination by the World Heritage Committee at its 46th session, considering that the absence of significant progress in modifying the Scheme consistent with the Committee's decisions and in accordance with the recommendations of the 2022 Advisory mission, would require a broad mobilization to preserve the Outstanding Universal Value of the property, including the inscription on the List of World Heritage in Danger.'*

This report along with an additional 'package of information' relevant to the road scheme was delivered by the UK government but with the specific request that it should not be published by UNESCO. It has proved impossible thus far to obtain copies of these submissions.

Importance of inscribing the property on World Heritage in Danger

Bearing in mind the road scheme has not been modified we hope that the World Heritage Authorities will intensify pressure on the UK Government, and that the World Heritage Centre, in its Report and Draft Decision for the World Heritage Committee meeting in 2024 will maintain the concerns and recommendations for State Party action set out in recent Committee Decisions and Advisory Missions' recommendations. In our view it is imperative that Stonehenge WHS is added to the List of World Heritage in Danger at the very earliest opportunity.

Addendum 23/04/24

The legal challenge was heard in the UK's High Court from 12–14 December 2023. Regrettably the application for permission to apply for judicial review was refused by the High Court (February 2024) and was thus unsuccessful.



Fig. 3: The Stonehenge Alliance Committee met outside the Royal Courts of Justice on 12 December 2023. Photo: Stonehenge Alliance

SSWHS, in consultation with its legal team has applied to the Appeal Court (March 2024) for a review of the High Court decision, this required a further fundraising effort. It is not known at the time of writing whether the Appeal Court will grant permission for the challenge to proceed, this process is uncertain.

Unfortunately, the High Court decision was a major setback and brings the destruction of the WHS a step closer, it is critical that the WH Committee acts now before the bulldozers begin to inflict irreversible and permanent harm to the WHS and its OUV.

Abusive Planning Application within UNESCO Buffer Zone of the Ġgantija Temples

Joerg Sicot, Flimkien għal Ambjent Aħjar



Gozo's Ġgantija Temple, datable to the Late Neolithic period, is among Malta's six ancient temple sites that have received distinctive UNESCO World Heritage protection (Dec. Code: 39 COM 8B.46)

The Ġgantija Temples immediate environs and skyline are under ongoing threat despite the Flimkien għal Ambjent Aħjar call for its immediate protection in the WHW Report 2021 ref. World Heritage Watch 2021 – Report (world-heritage-watch.org) pg. 14.

A controversial planning application to build a 22-apartment block just 157 metres away from the site of Ġgantija temples was approved on Thursday 09 November 2023, despite the UNESCO request for a Heritage Impact Assessment, which was simply ignored and not submitted whilst evaluating the planning application. The proposal lies within the revised Buffer Zone as established and confirmed by UNESCO in 2015 – ref. Megalithic Temples of Malta – Maps – UNESCO World Heritage Centre

The disruption of the temple view with the backdrop of a modern building would be a major impact on the ancient skyline, particularly problematic as such views have been destroyed elsewhere in Malta. Such a building would extend high above the iconic temple skyline.

The development threatens not only visitors' enjoyment of the site but obstructs vital archaeological research into Late Neolithic Malta. The southern edge of the Xagħra plateau is unique for its concentration of prehistoric sites (such as Santa Verna, Xagħra

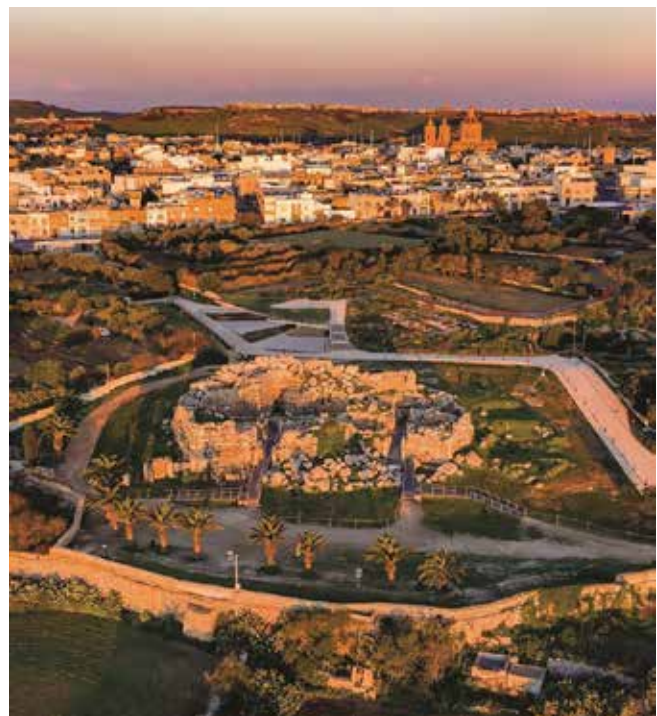


Fig. 1: Ġgantija Temples, Gozo.

Photo: Daniel Cilia

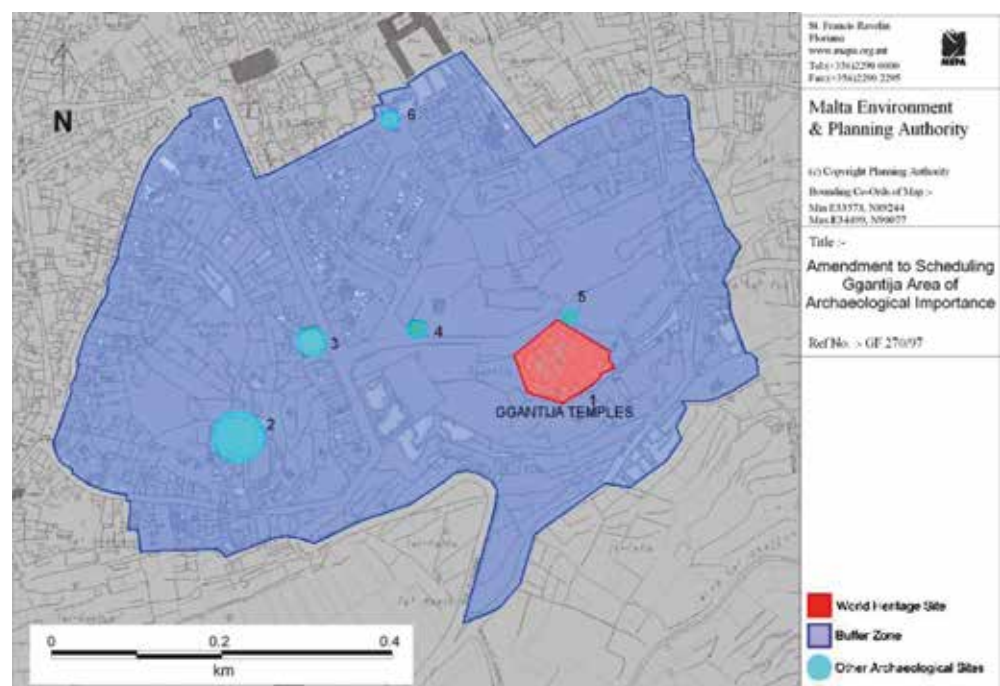


Fig. 2: The Buffer Zone of the Ġgantija Temple & Xagħra Stone Circle as adopted by UNESCO Decision in 2015.

Map: Malta Planning Authority

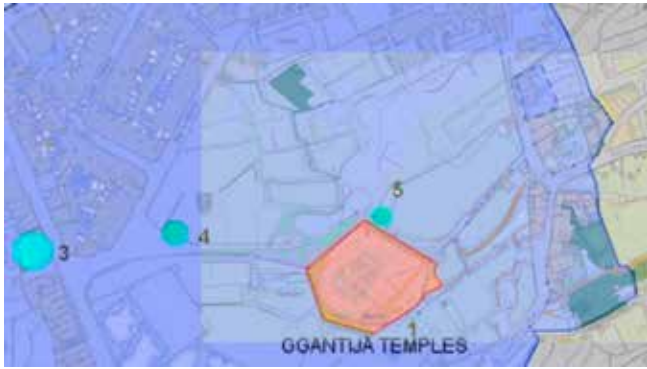


Fig. 3: The Planning Proposal, marked dashed blue, is well within the Buffer Zone. Map: Shift News

Circle, Ta' Ġesu', as well as Ġgantija), all linked by their Late Neolithic viewlines; therefore, the preservation of this view is vitally important. The building would also require 1,100 square metres of excavation for basement-level garages, resulting in the removal of archaeologically-rich untouched soils.

Appeals launched against the planning application

Alongside a costly and strong appeal filed by Flimkien għal Ambjent Aħjar against the decision taken by the Planning Authority, three further appeals have been submitted in the courts of Malta against this abusively approved planning permit PA/00570/21. The grievances filed by FAA are:

1. The approved development PA 00570/21 is contrary to the Gozo and Comino Local Plan (GCLP), in particular Policy GZ-Edge-1c.
2. The application constitutes a violation of the Development and Design Guidance 2015 (DC15), in particular policies P6, P42, G2, G3, G23.
3. The development, as approved, is contrary to Thematic Objective 7 Urban Objective 3d of Strategic Plan for Environment and Development – SPED15.
4. The approved application violates Cap 552 of the Development Planning Act as it is manifestly clear that there is a grossly incorrect and untrue statement by the applicant regarding the buffer zone. The established buffer zone is a non-negotiable obligation which the State Party of Malta has with UNESCO.
5. The approval of the permit is not in conformity with the Cultural Heritage Act, Chapter 445 of the Laws of Malta, in particular Section II as well as pursuant to article 66 of such legislation.
6. The approved application completely ignores Article 191 TFEU and Article 3 of Directive 2011/92 governing the special mechanism known as the Environment Impact Assessment in Malta.
7. The call for a Heritage Impact Assessment for the prestigious site situated in the vicinity of the Ġgantija Temples was



Fig. 4: The Development Proposal is within only 157m from the Ġgantija Temple. Image: Times of Malta

not required to be carried out by the Planning Authority of Malta, despite the sensitivity of the prestigious temple site as recognized by UNESCO.

8. The approved planning application violates various Aarhus Convention parameters and principles and directives that Malta is a signatory to, as well as to various European Directives on public access to environmental information.

Demands to the State Party of Malta

- The State Party of Malta must urgently intervene to ensure that no development may obliterate the visual enjoyment and legibility of the UNESCO World Heritage Site Ġgantija Temples, be that from the perimeter of or as in this case, directly within the buffer zone as established at law.
- The State Party of Malta must ensure that the enjoyment of its World Heritage Site is not treated as a negotiable good, ripe for the speculative profit drives of business developers. It is unacceptable that the enjoyment of a UNESCO World Heritage Site is severely disturbed by random construction development and thus depriving the general public of its right to free and unencumbered enjoyment of its cultural heritage.
- The State Party of Malta must ensure that calls by UNESCO, ICOMOS and the Superintendence of Cultural Heritage (Malta) for accurate Heritage Impact Assessments in such sensitive settings are clearly taken into consideration by the Planning Authority in Malta. Non-adherence to such calls are considered an abuse of the Planning Authority's powers and remit.

Latest news

After four appeals were filed against the planning application, suddenly the Superintendence for Cultural Heritage has worked up, filed a request with the Planning Authority to revoke the approved permit ... and that was done on 07 March 2024. A new attempt will be made, but then a HIA will be called for ... and that will make such an invasion far more difficult for any developer.

The Acropolis of Athens: A Story of Arrogance and Fallacy

Tasos Tanoulas on behalf of Hellenic ICOMOS and SOS Acropolis



The Acropolis of Athens appeared in the shortlist of the nominees for monuments at risk in the years 2020/2021. I will try to update, referring to the activities of the Hellenic Ministry of Culture, after the publication, in April 2023, of the Report submitted by the joint WHC / ICOMOS Advisory Mission, which visited Athens for checking on the Acropolis, in April 2022.¹

The Mission found itself before a *fait accompli*, that is: the reinforced concrete routes, the elevator, the lighting, the railing for the routes-demarkation. Unfortunately, the Joint Advisory Mission's information was completely under the control of the Hellenic Ministry of Culture. This does not justify, but can explain the fact that the Mission's Report, after rightly praising the former restoration projects of the monuments, accepted the Ministry's claim that the reinforced concrete routes on the bedrock are reversible, despite their being conspicuously irreversible (Fig. 1, see all Figures at the end of this article).

The Mission's report, also, ignored the damages done to the rock and antiquities on the Acropolis, a fact already denounced by Civil Society experts and activists and published in the WHW Reports 2021,² 2022.³ The Mission's criticism on the recent implementations was limited to suggestions on elements that could still be improved.

However, for the Proposed Covering of the Acropolis Rock (Fig. 2) and the Proposed Western Access Project (Fig. 19), the Mission recommended to the Greek State Party⁴ to conform to the UNESCO/ICCROM/ICOMOS/ITCN guidance (2002) and other Operational Guidelines to the World Heritage Convention, as following:

1. Prior to any implementation, a Heritage Impact Assessment should be carried out, based on detailed documentation with argumentation, plans and drawings; next, the whole package of information should also be shared with the WHC for review by the Advisory Bodies.
2. Since no Management Plan nor Tourism plan have ever been submitted for the Acropolis, such plans would have to be done, and the Acropolis implementation projects should be inscribed in them.

The Hellenic Ministry of Culture, in a press release,⁵ deliberately misinterpreted or, rather, distorted the Report, as highly prais-

ing the implementation on the Acropolis (that is true only for the older restoration of the monuments). The Ministry's leadership systematically distorted the Mission Report's recommendations through the mass media,⁶ belittling any different voice which presented an objective interpretation of the Mission's report.⁷ As to the Proposed Western Access Project, the Ministry appeared as disposed to comply with the Report's recommendations.

In fact, the continuous construction on and around the Acropolis shows exactly the opposite intention, that is, paying little attention to the Mission Report's recommendations.⁸ The Ministry justifies construction as simply utilitarian, such as, the drainage system (Fig. 3–4), minor pathways (Fig. 5), the new ticket office (Fig. 6–8) etc. Especially, the drainage system provided a pretext for the implementation of a dense network of massive drainage channels, spreading widely in the archaeological site. What makes things worse (Fig. 9–19), is that the usual way of digging is not that of methodical archaeological excavation, as is the normal procedure, but that of mechanical excavators.

More seriously problematic, from the archaeological management and restoration point of view, are structural interventions on minor ancient monuments, such as: the unnecessary "consolidation" of the Agrippa pedestal (Fig. 11–12) or the "restoration" of minor monuments such as the installations of cement copies of inscriptions on new cement bases, or the exhibition of a group of precious inscribed blocks in the open air, instead of being exhibited in a museum, as is the normal procedure for inscriptions. The massive use of new materials, reinforced concrete and marble, exceeds a percentage of sixty per cent. All these will be placed at random positions on the rock (Fig. 13). Such works should not be implemented before the fulfilment of the Mission Report's recommendations and the approval by the World Heritage Committee.

These activities show a disrespect, on behalf of the Ministry of Culture, to the Mission Report's recommendations. This evidence of disrespect is corroborated by the following incident. The official superintendent, initiator and director of practically all the structural projects concerning the Acropolis monuments is the Committee for the Conservation of the Acropolis Monuments (ESMA), which is appointed by the Minister of Culture.

The president of ESMA, Manolis Korres, in a lecture delivered on July 4, 2023⁹ expressed his disapproval of the Advisory Mission, by rejecting the competence of the experts for judging the recent works on the Acropolis, and declaring that whatever the Mission Report would recommend for the Acropolis, he and his small group of specialists would still do what they hold as correct, ignoring UNESCO's recommendations.¹⁰

Also, Korres declared that the Mission was the result of a private plea addressed by Civil Society to the director of WHC. By doing this, Korres belied publicly the Hellenic Ministry of Culture, which insisted on loudly claiming that it was the Ministry that had initially invited the Mission for checking on the works.

Moreover, the unprecedented rows of crowding tourists (Fig. 14–18) in spring/summer 2023, reaching 22.000–23.000 people daily, were used as argument for more structure. It is an axiom, that the only solution to overcrowding problems, which endanger both monuments and visitors, is to control the number of visitors accommodated in the site simultaneously, and this should be resolved by management plans carried out after thorough study by specialized experts. The minister of Culture said the solution would be to make immediate structural interventions to the western access to the Acropolis and inside the Propylaia. The Minister said: “We can't demolish the Propylaia, but we can widen it”, as if the Propylaia was a pair of shoes!¹¹ On the other hand, the aforementioned chairman of the YSMA declares that the reinstatement of the Roman staircase in the western access of the Acropolis is not “to facilitate the number of visitors” but to respond to his belief that “it would add to a better understanding of the site”.¹²

Studies for the western access, are not open for public view, as they seem to have been awarded directly to private companies. However, according to information they all declare their being modelled after Korres' illustrated booklet presented in the 7th International Meeting for the Restoration of the Acropolis Monuments.¹³ The re-arrangement of the western access¹⁴ (Fig. 19) is to cover practically all of the area between the Propylaia, the Nike bastion and the Agrippa pedestal, and the south half of the lower area inside the Beulé Gate. Moreover, it will not reinstate the Roman forms. Especially in the central passage-way a modern step-form will be applied. The steps will be of marble, but in other cases of steel-grating or cement. The supports will be mostly metal posts resting on the rock and on antiquities. The ancient remains underneath will be practically inaccessible. A stairs-platform-lift will move along sloping rails on the north side of the central passageway, while similar mechanism will run along sloping paths or stairways connecting to the south slope. Another mechanism will connect the area at the foot of the Agrippa pedestal with the slope west of the Beulé Gate. Moreover, the Propylaia is destined to serve as a station for disabled-people-vehicles. The disabled people will sit on the reconstructed ancient benches along the walls.

The Propylaia will serve as a passageway for tourists entering the site and as a monument visited by tourists at the same time. The proposed additional structures for protecting the original steps below the colonnades and before the door-wall (steel slabs), additional pavements for the protection of the Propylaia floors (“breathing” carpets) guarantee only permanent damages and disfiguration of the architecture of the monument. Rather than an archaeological site, the western slope of the Acropolis will look like an exhibition centre of contemporary engineering and of technologies for the accommodation of disabled people. All these implementations clash with the 1964 Charter of Venice and the 2003 ICOMOS Charter on Principles etc. Furthermore, they presuppose major rearrangements in the archaeological sites to the north, west and south of the Acropolis, which would involve long term systematic excavations before any implementation.

In April 2023, the Hellenic Ministry of Culture contracted a private company to provide Management Plans for eleven Greek Monuments/Sites, listed as World Heritage, representing Prehistory, Antiquity and Byzantium, namely the following: Mycenae, Tiryns, Acropolis, Apollo Epicurius, Olympia, Epidaurus, Delphi, Mystras, Daphni Monastery, Hosios Loukas, Nea Moni. Details of contracts are not published yet. But according to the website of the company which was awarded the contract / project, its activities are not relevant to heritage management.¹⁵

The implementation of visiting time zones introduced in the last fall,¹⁶ proved to be only a smoke-screen to conceal the lack of essential management plans. The proposed measures involve more and more structures filling with new material the space between the classical masterpieces.

The Hellenic Ministry of Culture has announced that the studies and the decision-making procedures will be completed in the fall of this year, 2024. There is little doubt that by then more construction will have been added in and around the Acropolis. These works will clash with the 1964 Charter of Venice and the 2003 ICOMOS Charter on Principles of Analysis, Conservation and Structural Restoration of Architectural Heritage, as much as the Project for the Western Access and the temporarily postponed Project for the Covering of the Acropolis rock.

We have seen above that the Hellenic Ministry of Culture, by systematically implementing massive structures on and around the Acropolis, keeps ignoring the Advisory Mission Report's recommendations, proceeding with no management plans, following non-transparent procedures. The urgency of the situation on the Acropolis is more alarming than ever before, and we cannot but resort to the co-operative relationship with the international heritage organizations to protect this unique ensemble of nature and architecture.

Therefore, it is mandatory that the following actions be taken:

1. First of all, the “Acropolis, Athens” World Heritage Property must urgently be put on the agenda of the World Heritage Committee.
2. The World Heritage Committee must request from the Greek State Party

To stop all practical activity on the site immediately until the WH Committee has taken a decision about the implemented and planned works.

Notes

- 1 <https://whc.unesco.org/en/documents/199557> (Accessed 27.02.2024)
- 2 <https://world-heritage-watch.org/content/wp-content/uploads/2021/06/WHW-Report-2021.pdf>, pp. 21-27 (Accessed 27.02.2024)
- 3 <https://world-heritage-watch.org/content/wp-content/uploads/2022/11/2022-Report-WHW-final.pdf>, pp. 227-231 (Accessed 27.02.2024)
- 4 <https://whc.unesco.org/en/documents/199557> (Accessed 27.02.2024)
- 5 <https://www.culture.gov.gr/el/Information/SitePages/view.aspx?nID=4560> (Accessed 27.02.2024)
- 6 <https://www.kathimerini.gr/society/562377325/unesco-poly-kala-prostatey-meni-i-akropoli/> (Accessed 27.02.2024), <https://www.in.gr/2023/04/19/life/culture-live/unesco-akropoli-protypo-syntirisis-klironomias-se-pagkosmio-epipedo/> (Accessed 27.02.2024), <https://www.lifo.gr/now/entertainment/unesco-i-akropoli-protypo-syntirisis-klironomias-se-pagkosmio-epipedo> (Accessed 27.02.2024)
- 7 <https://thepressproject.gr/epistimones-kai-anthropoi-tou-politismou-sti-litevoun-to-neo-tsimentoma-tis-akropolis/> (Accessed 27.02.2024), <https://www.culture.gov.gr/el/Information/SitePages/view.aspx?nID=4591> (Accessed 1.03.2024)
- 8 <https://world-heritage-watch.org/content/wp-content/uploads/2023/06/WHW-Report-2023.pdf>, pp. 48-49 (Accessed 27.02.2024)

To submit a Management Plan and a Tourism Plan for the Acropolis, Athens, developed with full participation of civil society and transparent procedures, before any other interventions on the site can be considered.

If the WHC and the WH Committee would not respond to the above requests, it would become evident that they estimate the Acropolis as of minor importance among the World Heritage Monuments. This would have serious negative effects on the Outstanding Universal Value of the World Heritage Property, Acropolis, Athens.

9 <https://triantafylloug.blogspot.com/search/label/APXITEKTONIKH%20ΔΙΑΛΕΞΕΙΣ>

10 Korres's phrasing: “Even if UNESCO had different views, we are not a protectorate, and so we would do what we hold as correct.” ... “our interlocutors from UNESCO were not better than us! They did not have the same specialization, not our PhDs, nor our books, neither our range of international science! They are simply UNESCO executives and, in spite of this, they come to judge us! We were humiliated when they came. I knew that I was better [than them], ...but they had played a role.”

11 <https://www.culture.gov.gr/el/Information/SitePages/view.aspx?nID=4615> (Accessed 27.02.2024)

12 <https://www.theguardian.com/world/2023/jul/09/acropolis-greek-tourists-cruise-ships-athens-controls> (Accessed 1.03.2024)

13 <https://www.theacropolismuseum.gr/synedria/7i-diethnis-synantisi-gia-tin-apokatastasi-mnimeion-akropoleos> (accessed 09.03.2024). Korres, M., *Μελέτη Αποκαταστάσεως της Αναβάσεως (Study of the Restoration of the Ascent)*, Athens 2021.

14 <https://digitalculture.gov.gr/2021/02/apokathistate-i-ditiki-prosvasi-tis-akropolis/>

15 <https://www.tpa.gr/about/> (Accessed 27.02.2024)

16 <https://www.skai.gr/news/culture/mendoni-apo-ti-tou-septemvri-zones-episepsimotitas-stin-akropoli> (Accessed 27.02.2024)

Photographic Documentation

All photos and graphics by Tasos Tanoulas except where noted otherwise.



Fig. 1: Paving the rock to the east of the Propylaea. Above: The metal mesh spread on the white plastic sheet resting directly on the living rock. Below: To the right at the bottom of the picture, the thickness of the reinforced concrete resting on the living rock. (October 2020)

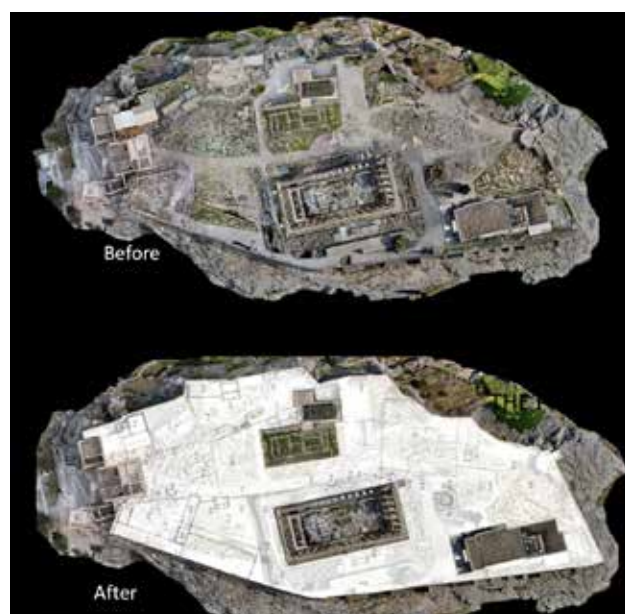


Fig. 2: Photomosaic plans of the Acropolis (2020). Above, before the reinforced concrete pathways were implemented in 2020. Below, the same plan; in white, the proposed covering of the Acropolis rock between the major monuments for the leveling of the site as it was, according to Korres' view, in the 5th c. B.C.

Source: Greek Ministry of Culture and Sports



Fig. 3: Part of the dense network of massive drainage channels, built in reinforced concrete, spreading widely in the archaeological site below the Acropolis. (October 2022)



Fig. 4: Big plastic pipe buried to the south of the Areopagus, part of the drainage network. View of the ditch looking west. The big pipe is being encased in cement that will bear the fill to reach the surrounding ground level. (March 2023)



Fig. 5: A pathway out of the boundaries of the tourists' routes on the Acropolis in the process of being paved with reinforced concrete. Above left, the new elevator. Above right, behind the tree the Erechtheion. View from southwest (January 2023)



Fig. 6: The foundations of the new ticket office buildings, with vertical rods for the reinforcement of the walls. At the background the rock of the Areopagus. View from the south. (2024)



Fig. 7: A closer view of the foundations of the new ticket office from the southeast. Above on the right, the rock of the Areopagus. (2024)



Fig. 8: View from the northwest end of the Acropolis northern wall, looking northwest. In the image, below: the Peripatos, lined with a covered drainage channel on the south, all constructed with reinforced concrete; in the middle, among the trees, a winding drainage channel. The drainage network was completed in 2023. Above, in a red ellipse, the foundations of the new tickets office (under construction) and, to the right, the rock of the Areopagus. Further up, the Pnyx and the Observatory. (2024)



Fig. 9–10: Two successive stills from a video showing a mechanical excavator at work, at the area destined for the new ticket office. (2023)



Fig. 11: “Consolidation” of the Agrippa Pedestal. Prestressed rods, framing the periphery of the course on top of the foundation. Two prestressed rods inserted in cylindrical holes that are straight through and enter and exit on the external surfaces of the course. (2023)



Fig. 12: Detail of the “consolidation” illustrated in the previous picture, with the detail of the south end of the prestressed rod, visible at the middle of the south side of the course. (2023)

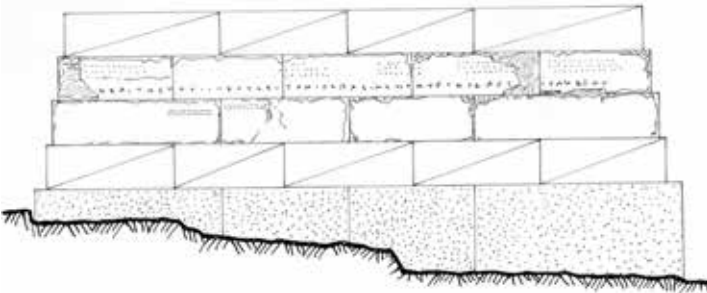


Fig. 13: View of the exhibition of a group of precious inscribed blocks in the open air, instead of being exhibited in a museum, as is the normal procedure for inscriptions. From bottom to top: reinforced concrete base, new marble blocks course, two courses with the original inscribed blocks, crowning course with new marble blocks. To be started soon.



Fig. 14: Queuing before the ticket booth. (2023)



Fig. 15-16: Queuing before the ticket control. (2023)





Fig. 17: Going up the west slope to the Acropolis plateau through the Propylaea. (2023)



Fig. 18: Leaving the Acropolis plateau through the Propylaea. (2023)

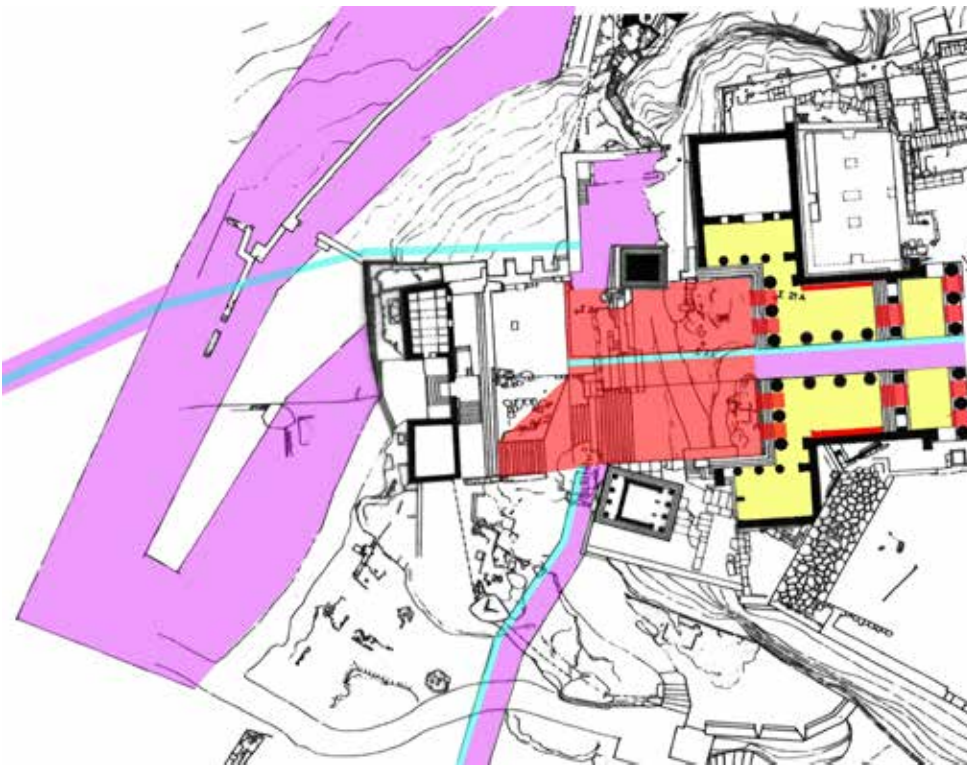


Fig. 19: Plan of the western access to the Acropolis. **Red**: indicates new material added in the western access between the Propylaea and the Beulé Gate, including structural implementations in the Propylaea (sheathing original marble steps and stylobates with stainless steel, reconstruction of the benches along the wall of the Ionic Hall). **Purple**: new material, most probably reinforced concrete, covering the terrace to the north of the Agrippa pedestal, and new pathways to the north, west and south of the Acropolis. **Yellow**: areas of the Propylaea, at the same time serving as station for disabled people equipment, passage-way for going into and out of the Acropolis, visited architectural masterpiece. **Blue**: stairs-platform-lifts moving along rails on the one side of pathways or steps. (2024)

The Expansion of Catholic Iconography in the Mosque-Cathedral of Cordoba

Vanesa Menéndez Montero

The Mosque of Cordoba was included on the World Heritage List in 1984 based on criteria i, ii, iii and iv of the Operational Guidelines to the World Heritage Convention. These criteria exclusively referred to the Islamic features of the monument. Precisely, ICOMOS recognized the Mosque to be a “unique and exemplary monument” with an Outstanding Universal Value due to its dimensions and the boldness of its interior elevation, its influence on Western Muslim art, its relevance as a testimony to the Caliphate of Cordoba (929–1031) and its exemplarity within Islamic religious architecture. These features were further acknowledged by the World Heritage Committee, both in 1984 and 1994.

On its 18th session, the World Heritage Committee agreed to extend the inscription of the Mosque to its surroundings (1994). From that moment on, the Historic Centre of Cordoba attained World Heritage status, and the Committee formally adopted the name “Mosque-Cathedral of Cordoba”. Thereby, the Committee recognized the Catholic affiliation of the Mosque after the conquest of Cordoba by King Ferdinand III in 1236. Yet, the Catholic characteristics of the Mosque-Cathedral were not determinant nor mentioned in the original inscription to the World Heritage List nor on the “Retrospective Statements of OUV”

adopted in 2014. It means that the OUV of the Mosque-Cathedral of Cordoba still significantly relies on its Islamic nature.

Spain submitted two periodic reports on the State of Conservation of the Historic Centre of Cordoba to the World Heritage Committee (2006, 2014). In both, Spain assured that the OUV of the Mosque-Cathedral of Cordoba has been consistently preserved (i.e., the authenticity of its size, design, materials, use and functionality has been maintained). Albeit the Bishopric of Cordoba retains the management of the Mosque-Cathedral under contested property titles, Spain pointed out that the Ministry of Culture, the regional government of Andalusia, and the local government of Cordoba exercise supervisory powers over the site.

The deployment of Catholic imagery in Islamic spaces

Over the last two decades, the Bishopric of Cordoba has been continuously deploying Catholic statues, paintings, and symbols within and outside of the Mosque walls, therefore exceeding the space reserved for the Catholic cult and invading the Islamic

precinct of the monument. This practice is not only unjustified on artistic grounds, but it also gives the visitor a misleading narrative about the history of the Mosque-Cathedral. Furthermore, the excessive performance of Catholic ceremonies diminishes the historical value of the monument. Thus, by erasing the Islamic identity of the building and concealing its Islamic values, the Bishopric of Cordoba is undermining the OUV of the Mosque-Cathedral.

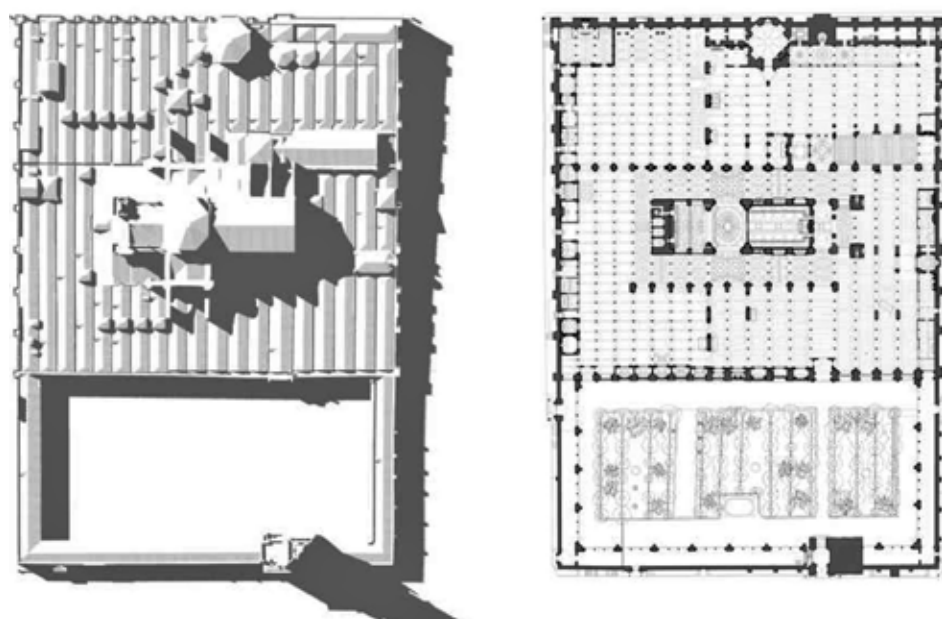


Fig. 1: Plan of the Mosque-Cathedral of Cordoba, scale 1:250. The area of the Cathedral, with a Latin cross plant, stands in the middle of the ampliations of the original Mosque.

Source: Gabriel Ruiz Cabrero (2009), via Master Plan 2020



Fig. 2: The Qibla wall of the Great Mosque of Córdoba is considered the most relevant area of the monument. On the left side of the wall is the Mihrab of Al-Hakam II. Out-of-context Catholic imagery covers the entire wall. In the foreground, a lectern from the transept choir obstructs the view of the Qibla.

Photo: Plataforma Mezquita-Catedral de Córdoba



Fig. 3: The Exhibition of Vera Cruz in the middle of the forest of columns of the Mosque distorts the Andalusian legacy protected by UNESCO (2016)

Photo: Plataforma Mezquita-Catedral de Córdoba



Fig. 4: Beyond forty floats were displayed in the forest of columns of the Mosque during the Great Exhibition of Pasos Cofrades (2019).

Photo: Plataforma Mezquita-Catedral de Córdoba

The unjustified occupation of the Islamic space with Catholic iconography jeopardizes the authenticity of the Mosque-Cathedral of Cordoba and undermines its OUV and cultural diversity. Local associations such as *Plataforma Mezquita-Catedral de Córdoba* raised these concerns and issued formal complaints to the relevant public authorities. Their claims, however, have been rejected so far due to administrative silence.



Fig. 5: Catholic chapel covering one Almanzor gate on the occasion of Corpus Christi celebrations (2022).

Photo: Plataforma Mezquita-Catedral de Córdoba



Fig. 6: Usual intervention in the forest of columns of the Mosque for the conduction of a Catholic event (2023).

Photo: Plataforma Mezquita-Catedral de Córdoba

The pitfalls of the 2020 Master Plan for the Mosque-Cathedral of Cordoba

In 2020, the Cathedral Chapter proposed a Master Plan to regulate the management of the Mosque-Cathedral. Yet, instead of echoing the above-mentioned concerns, the Master Plan neglected the most basic principles of the World Heritage Convention. On the one hand, there is hardly any mention of the Andalusian character of the monument. The Master Plan depicts the Mosque-Cathedral just as a Catholic church, thereby denying its artistic, historical and cultural values as have been recognized by UNESCO. Consequently, the document pays little attention to the cultural and tourist use of the Mosque-Cathe-

dral, which serves up to two million visitors per year. By contrast, it gives prevalence to its liturgical use, which takes place around 10% of the opening time. In line with this view, the Master Plan links the authenticity of the Mosque-Cathedral to its religious-Catholic function and not to the original values that granted its inclusion in the World Heritage List. This strategy thus allows the deployment of Catholic elements in spaces of Islamic significance without amounting to a breach of the World Heritage Convention.

On the other hand, the Master Plan disregards paragraph 119 of the Operational Guidelines to the World Heritage Convention. By not providing any means to channel the participation of local communities, NGOs or other interested partners, the Master Plan leaves the monopoly of the decision-making in management matters in the hands of the Cathedral Chapter. Despite these pitfalls, in December 2023, the regional government of Andalusia gave the green light to the Master Plan. However, in light of the recent developments, the Cathedral Chapter cannot guarantee the protection of the OUV of the Mosque-Cathedral. Eventually, it is Spain, as a State Party to the World Heritage Convention, who will have to respond for current damages to the intangible elements of the Mosque-Cathedral.

A preliminary call to the World Heritage Committee

The World Heritage Committee has not been informed about the 2020 Master Plan thus far. Hence, there has been no coordination between UNESCO and the Spanish public authorities in this field. There is a widespread fear that the monitoring of the state of conservation of the Historic Centre of Cordoba dilutes the protection of the Mosque-Cathedral as proposed in 1984. It is, therefore, necessary to draw the attention of the World Heritage Committee to the specific issues of OUV protection of the Mosque-Cathedral of Cordoba. Acting in its capacity, the World Heritage Committee can call upon Spain to fulfil its obligations under the World Heritage Convention. To this end, the first step is to urge Spain to request the adoption of a separate Management Plan for the Mosque-Cathedral or the modification of the existing Master Plan aligning with the Operational Guidelines of the World Heritage Convention.

Combining religious and cultural uses of World Heritage sites is not only feasible, but also highly desirable. In this regard, Spain

should not prohibit Catholic ceremonies in the Mosque-Cathedral of Cordoba, but it must compel the Bishopric to respect, promote and protect its Islamic features. Expressing it differently, Spain must strike a balance between the international status of the Mosque-Cathedral of Cordoba as a World Heritage site, allowing every human to enjoy it, and the right of the local population to express and practice their freedom of religion.

The case of the Mosque-Cathedral of Cordoba opens a new debate on the misuse of World Heritage site spaces as a matter of authenticity beyond material modification or ill-restoration. Authenticity values are also present in intangible elements of the monuments' interior and exterior spaces. Preserving authenticity becomes even more urgent in the case of World Heritage sites with two or more excluding precincts. In the face of the current rise of religious intolerance in most contemporary societies, the World Heritage Committee must stand up as the guardian of collective memory, historical truth and cultural diversity. The Mosque-Cathedral of Cordoba and the protection of its most significant values constitute a good starting point.

References

- ICOMOS. Advisory Body Evaluation, *World Heritage List no. 331*, May 1984: <https://whc.unesco.org/en/documents/153175>
- ICOMOS. Advisory Body Evaluation, *World Heritage List no. 331 bis*, May 1994: <https://whc.unesco.org/en/documents/153176>
- UNESCO. World Heritage Committee, 8th Session, *Inscription: The Mosque of Cordoba (Spain)*, Decision 8 COM IX.A, (Buenos Aires, Argentina, 29 October – 2 November 1984): <https://whc.unesco.org/archive/repcom84.htm>
- UNESCO. World Heritage Committee, 18th Session, *Extension and Change of Name: The Historic Centre of Cordoba (extension of the Mosque of Cordoba) (Spain)*, Decision 18 COM XI (Phuket, Thailand, 12 – 17 December 1994): <https://whc.unesco.org/archive/repcom94.htm>
- UNESCO. World Heritage Committee, 38th Session, *Adoption of Retrospective Statements of Outstanding Universal Value*, Decision 38 COM 8E (Doha, Qatar, 15-25 June 2014): <https://whc.unesco.org/en/decisions/6149/>
- UNESCO. World Heritage Centre, State of Conservation of World Heritage Properties in Europe, *Spain. Historic Centre of Cordoba*, Section II (Cycle I, 2006): <https://whc.unesco.org/en/documents/163259>
- UNESCO. World Heritage Centre, State of Conservation of World Heritage Properties in Europe, *Spain. Historic Centre of Cordoba*, Section II (Cycle II, 2014): <https://whc.unesco.org/en/documents/164375>
- Cabildo Catedral de Córdoba, Plan Director Mezquita-Catedral de Córdoba, 2020: https://mezquita-catedraldecordoba.es/site/assets/files/29170/plan_director_mezquita-catedral_de_co_rdoaba_2020_propuesta.pdf
- UNESCO / ICRROM / ICOMOS / UICN, *Managing Cultural World Heritage*, 2014: <https://whc.unesco.org/en/managing-cultural-world-heritage/>
- Plataforma Mezquita-Catedral de Córdoba: <https://plataformamezquitacordoba.es>

Visitor Management Issues of the Hagia Sophia Indicate That it Should Have Remained a Museum

Anonymous author¹



Fig. 1: The Hagia Sophia and Visitor Direction Signs.

Photo by the author

Hagia Sophia, managed as a museum since 1934, was reconverted to a mosque status by a decree of the Turkish Presidency in 2020. Due to the monument's reutilization as a mosque and the 24/7 open access policy implemented, the visitor density and related damages increased. Upon the recommendation of the UNESCO WHC, the State Party prepared a visitor management plan to address this issue². In October 2021, Minister of Culture and Tourism of the Turkish Republic, Mehmet Nuri Ersoy announced this visitor management plan to the public, and its implementation commenced on January 15, 2024.

The 2023 World Heritage Monitoring report for Hagia Sophia is primarily concerned with assessing the effects of the visitor management plan. This plan, recently introduced by Turkish authorities, aims to safeguard Hagia Sophia from potential risks and damages resulting from visitor congestion in accordance with UNESCO's guidelines. However, the "visitor management plan" under review has not been shared with the public as an available document, and there has been no participation process involving expert organisations and stakeholders during the preparation of the plan. Additionally, discussions with members of the Advisory Board of the Istanbul Historic Areas Management Directorate did not occur while the plan was in draft form. This situation contradicts participatory planning and stakeholder consultation emphasised in §111 of the Operational Guidelines for implementing the World Heritage Convention.

Access to documents regarding the visitor management plan from public sources is unavailable as a document. However, information regarding current regulations that classify access to the monument for worship, tourism, and cultural purposes can be obtained from public announcements such as press conferences organised with officials' participation and social media statements. Under these circumstances, it is challenging to confirm the existence of a comprehensive "visitor management plan." According to public statements, the "visitor management plan" is a regulation that allows Turkish citizens to enter the ground floor of Hagia Sophia, which functions as a place of worship, free of charge. The gallery floor is open to visitors for a fee of 25 Euros. An audio guide system is available for the gallery floor to maintain a serene worship environment; guided tours are not allowed.³ Again, according to the visitor management plan, Turkish citizens have free access to the ground floor but, like all other visitors, require a ticket costing 25 Euros to access the gallery floor. It's important to note that since Hagia Sophia is no longer classified as a museum, Turkish citizens cannot benefit from national regulations concerning museum entrances or use tools such as museum cards to access the gallery floor.

The regulation conveyed in public statements was last observed on-site by the report's author on April 23rd, 2024. Signage for the prayer area and visitors' area directions around Hagia Sophia are visible (Fig.1). During the reporter's visit, the door at-

tendants explained that access to the ground floor of Hagia Sophia was free for all Muslims during prayer times. The rest of the time, Turkish citizens and individuals of different nationalities who declare they are Muslims and have purchased tickets to visit the gallery floor are also allowed to enter the ground floor if requested.

During verbal interviews with the on-site personnel, it was conveyed that Hagia Sophia's instantaneous visitor capacity is determined to be 7.000 individuals.⁴ Once the number of visitors on the ground floor reaches this threshold, admittance is temporarily suspended. It was observed that the staff suspended entries based on this limit during visitation. When asked how many people were inside around 3:00 – 3:30 PM on April 23rd, it was reported that approximately 10.000 people were inside, which led to the temporary suspension of entry. Therefore, the visitor management plan needs to significantly improve the control of visitor density on the ground floor (Fig.2).



Fig. 2: A crowded main hall (ground floor / worship – prayer area) of the Hagia Sophia.

Photo by the author

The visitor management plan lacks a specific tool to enhance the visitor experience on the ground floor by showcasing all aspects and significance of the building. As a result, it fails to help visitors gain a better understanding of the building's importance and value. The only implementation to be considered within this scope is the "information centre" on the ground floor in front of the Sultan Mahmut II Library. It consists of a stand and brochures that are quite mismatched with the building's design (Fig. 3). At this point, a booklet prepared by the Presidency of Religious Affairs is distributed, containing information about architectural elements from different periods of the building and Islam religion in Turkish and various other languages.

The ground floor has been equipped with accordion barriers to prevent damage similar to what occurred in the Imperial Gate in previous years.⁵ While these barriers are movable and do not directly intervene with the structure, they do not match the building's aesthetic value and make perceiving the space as a whole challenging (Fig. 4–5).



Fig. 3: "Information Center", Ground Floor.

Photo by the author



Fig. 4: Ground Floor shoe racks and accordion barriers.

Photo by the author



Fig. 5: Shoe racks in the inner narthex.

Photo by the author

In numerous visits conducted at different times, it has been observed that the apse mosaics are also covered with curtains outside of prayer times (Fig. 6).

Regarding the visitor experience on the gallery floor, the paid entry application has effectively ensured that the visitor density on the gallery floor is not as high as on the ground floor. How-



Fig. 6: Covered apse mosaics.

Photo by the author

ever, this section was closed to visitors when the building was converted into a mosque in 2020. Following restoration works and the announcement of the visitor management plan, it reopened to visitors for the first time on January 15, 2024.

The distinction between the conditions for visiting the ground floor and the gallery floor also brings about faith-based and nationality-based discrimination in accessing Hagia Sophia as a World Heritage site. In this regard, the situation contradicts the universal understanding and common heritage approach of the World Heritage Convention. Regulations concerning the ground floor allocated for worship limits the access for non-Turkish citizens to access this area. This regulation is discriminative and cannot adequately control the significant visitor traffic that poses a risk to the structure. Additionally, the relatively high entrance fee for the gallery floor, being exempt from the national regulations on museum entry fees, makes it difficult for citizens of the Republic of Turkey to visit the gallery floor, hindering the full appreciation of the structure's layers and values.



Fig. 7: Temporary Entrance of the Visitor Area and directory signage to the Hagia Sophia History and Experience Museum.

Photo by the author

Some of the architectural interventions made to regulate visitors' access to the gallery floor have also been criticised by the public. One of these is the entrance gate, which is stated to have been constructed to ensure the safety of ascending visitors (Fig. 7–8). According to the General Directorate of Foundations statement, the entrance gate to the gallery floor was built to ensure security in passages beneath the scaffolding of the ongoing restoration of the Beyazid II Minaret by the decision of the relevant conservation committee. This temporary structure is notable for its industrial shutter system. Despite being considered 'temporary,' this structure does not meet the standards expected from temporary structures that could be built under the requirements of historical environments like Hagia Sophia.

Another practice that has partially received criticism from the public is the wooden platform over the ramp and stairs leading to the gallery floor. However, officials and scientific committee members have clarified that this practice conserves the original stone floor in the building's visitor routes and ensures the safe walking of visitor groups.⁶



Fig. 8: Temporary Entrance Structure of the Visitor Area.

Source: Social Media

In previous years' mission reports, setting an 'archaeological garden' northwest of Hagia Sophia is recommended." The landscape design in this area is partially completed. Still, the displays related to archaeological artefacts lack information, and the space's design and organisation do not effectively communicate information about the artefacts (Fig. 9).⁷

Evaluation on the Scale of "Sultanahmet Urban Archaeological Component Area and Hagia Sophia"

The valuable messages of multiculturalism that Hagia Sophia has derived from Istanbul's multi-layered history and brought to the present day have long been overshadowed by ideological



Fig. 9: Archaeological pieces in the Hagia Sophia garden, sign text: "Maintenance of this green area is carried out by Fatih Municipality." Photo by the author

burdens and expectations influenced by religious and nationalistic viewpoints centred on transforming the monument into a church or mosque. The building lost its museum status in 2020 through a decision influenced by Turkey's mainstream politics, high judiciary, and the Presidency. Aside from the debates concerning the meaning and value of the structure, the established administrative system and institutional structure that had managed it as a museum since 1934 also changed, and the structure serves as worship.

Despite the need for a publicly available document clearly outlining Hagia Sophia's organisational management structure and distribution of responsibilities, we can piece together various information to gain a glimpse into its management system. With Hagia Sophia's conversion into a mosque in 2020, the building was transferred from the Ministry of Culture and Tourism to the Presidency of Religious Affairs. On July 16, 2020, Responsible public institutions announced that a protocol had been signed between the Ministry of Culture and Tourism and the Presidency of Religious Affairs for the protection, development, promotion, and management activities of Hagia Sophia. An "Administrative Board" was established for coordination as part of this protocol⁸.

The Scientific Committee, which has been involved in the conservation and restoration works of Hagia Sophia since 1993, continues its duties under the protocol.⁹ These boards are management setups that could positively impact decision-making processes and encourage inter-institutional coordination. However, besides these boards with administrative coordination and scientific guidance functions, an integrated management model needs to be specific to Hagia Sophia's scale.

When examined from a management perspective, the ground floor designated for worship is under the responsibility of the Presidency of Religious Affairs, while the gallery floor open to visitors is under the responsibility of the General Directorate of Foundations. The situation's importance is underscored when we consider 'Protection and Management,' one of the three

pillars of the UNESCO World Heritage system. These issues further reinforce the argument that Hagia Sophia should have remained a monument museum.

When we evaluate the status of Hagia Sophia, we must also assess the conservation status of the Sultanahmet Urban Archaeological Component Area of the World Heritage Site. This area encompasses several locations that demand careful site management and conservation efforts, necessitating the involvement of diverse disciplines and stakeholders (Fig. 10–11).



Fig. 10: Aerial photograph overlaid with Müller-Wiener's historical topography map of Istanbul, Sultanahmet area. Source: Müller-Wiener, W. 2016, *Historical Topography of Istanbul*.

A current example in this context, the Hagia Sophia History and Experience Museum needs to be analysed in terms of museology, interpretation, and reuse of this historic building¹⁰. Another example that explains the need to manage the Sultanahmet Urban Archaeological Component Area of the World Heritage Site can be mentioned: the largest section of the Great Palace excavated so far remains neglected. Other examples are St. Euphemia Church (Antiochus Palace) and the Lausus Palace. A dedicated project has been carried out to conserve the church's frescoes, and the Istanbul Metropolitan Municipality removed the illegal stage built on the remains of the Lausus Palace in 2022. On the other hand, the Istanbul Metropolitan Municipality has shared with the public a highly debated urban design project for the Hippodrome. However, an integrated approach is missing for these areas, and their relationship with each other, and these interventions remain fragmented. Therefore, mission reports recommend that a "Master Plan" covering the entire Hagia Sophia region becomes crucial.¹¹

Addressing the Sultanahmet Urban Archaeological Component Area of the World Heritage Site with a spatial and strategic master plan will benefit this multi-layered area's integrated con-

servation and presentation with a shared understanding among various stakeholders.

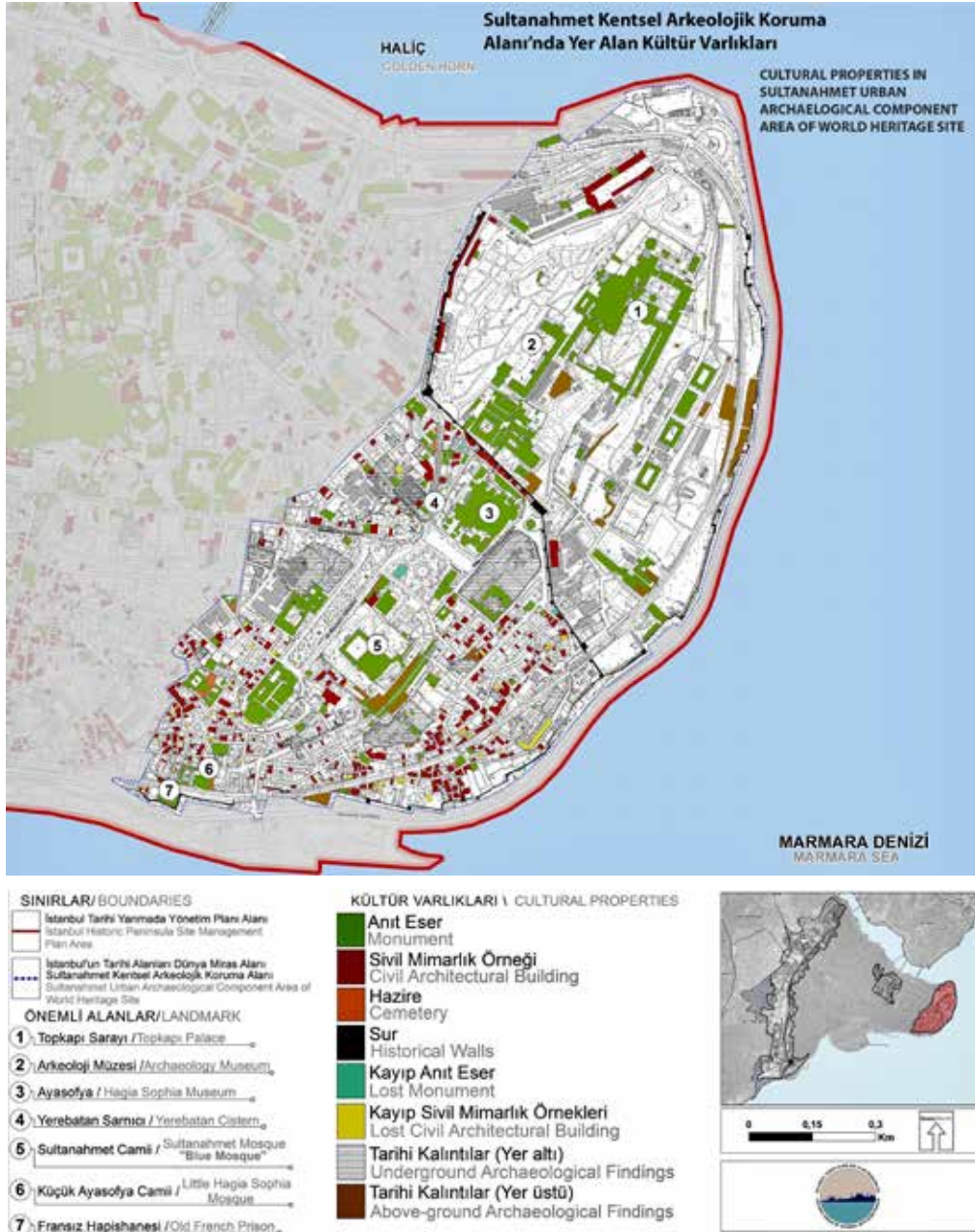
Furthermore, considering that the current Historical Peninsula Area Management Plan is dated 2018 and the dynamic nature of the area, it is strongly emphasised that it urgently needs updating. In this regard, local and central government authorities should be invited to fulfil their responsibilities regarding the World Heritage Site.

Notes

- 1 The identity of the author is known to World Heritage Watch.
- 2 UNESCO World Heritage Centre - State of Conservation (SOC 2023) Historic Areas of Istanbul (Türkiye) Document WHC/23/45.COM/7B.Add
- 3 <https://x.com/MehmetNuriErsoy/status/1719295675395932207>
- 4 Although there is no opportunity to confirm this visitor capacity restriction from official sources, it is unclear whether this number is based on a density calculation relative to the total area of the prayer area or on

capacity calculation considering the structural conservation conditions and vulnerabilities.

- 5 Methodiou, H. (2023). "The Justinian Hagia Sophia May Not Make it to 2050", World Heritage Watch Report 2023, p.52.
- 6 Ayasofya'daki tahribatı 30 yıllık Bilim Kurulu üyesi değerlendirdi: 'Müze olarak kalmalıydı' (12punto.com.tr) Evaluation of the destruction in Hagia Sophia (by a member of the Scientific Board for 30 years) 'It should have remained as a museum' (12punto.com.tr)
- 7 Bouchenaki, M. (2021). REPORT ON THE 2nd UNESCO Advisory mission to the World Heritage property Historic Areas of Istanbul (Turkey), pp.14-16.
- 8 Administrative Board – Ayasofya-i Kebir Camii (ayasofyaikebircamii.gov.tr)
- 9 Science – Ayasofya-i Kebir Camii (ayasofyaikebircamii.gov.tr)
- 10 Hagia Sophia visitors are directed to the Hagia Sophia History and Experience Museum, located in Sultanahmet Square. The Defer-i Hakani (Land Registry Office) building was transformed into the Museum by the Ministry of Culture and Tourism in 2023.
- 11 Bouchenaki, M. (2021). REPORT ON THE 2nd UNESCO Advisory mission to the World Heritage property Historic Areas of Istanbul (Turkey), pp.14.



The Monastery of Chora in Istanbul and the Role of UNESCO

Helen Methodiou

In a statement¹ on the Chora Monastery, part of the “Historic Areas of Istanbul” World Heritage, the Hellenic Committee of ICOMOS states:

“According to a recent decision of the Turkish State, the *katholikon* church² of the Chora monastery in Istanbul is being attributed to Islamic worship, without provisions to ensure the preservation of the material body of the monument and all the structural and artistic elements for the preservation of which it was recognised by UNESCO as a World Heritage Site. (...)

“The domestic policy objectives of a foreign state do not directly concern ICOMOS. But when they do have an impact on the characteristics of a monument on the basis of which the international community has decided to inscribe it on the World Heritage List, then ICOMOS, as the statutory technical adviser to UNESCO on matters relating to monuments and sites, has a duty to express its opinion, as does any organisation that is relevant to the matter and respects its principles.



Fig. 1: A worshipper holds a Turkish national flag during a prayer in the Chora museum, indicating that its re-dedication as a mosque was underpinned by strong nationalistic sentiments. The room had been altered for the service by placing a *mihrab* (prayer niche) into the far corner of the apse, erecting a wooden *minbar* (pulpit), and covering the famous mosaics with a textile cover (to the right of the minbar).
Photo: Ümit Bektash / Reuters

(...)

“The relatively small scale of the monument and the nature of the decoration require a careful management of the architectural shell, i.e. control of the number of visitors, control of the atmospheric conditions and the preservation of the monument.

Furthermore, since a key feature of the monument is the mosaics with Christian representations, the function of the monument as a place of Islamic worship would require their concealment and would remove a most important element of its artistic value.

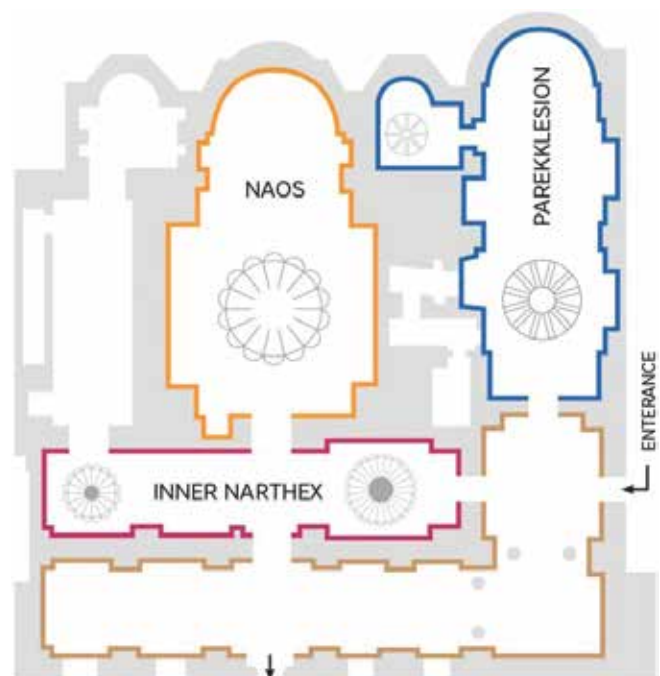


Fig. 2: Schematic floor plan of the *katholikon* church of the Chora Monastery. While the Nave – the main prayer hall – has only three mosaics, the outer and inner narthex exhibit altogether 52 mosaics, covering all of their walls. Their concealment would completely deprive these rooms of their artistic and aesthetic value.

Graphic: Elias Sarantopoulos



Fig. 3: A visitor lifts the cover of a mosaic in the nave of the church of the Chora. The covering of the mosaics affects the integrity of the monument and the state of conservation of the mosaics.
Photo: Erdem Shahin / EFA-ERE

The alteration of the cultural character and function of the *katholikon* church of the Chora monastery is bound to bring about a number of changes that will be imposed as necessary for its adaptation to the new conditions. This has already been demonstrated in the case of Hagia Sophia where, four years after the removal of its museum status and the imposition of its operation as a place of Islamic worship, the character of the monument has changed radically, not only from the point of view of aesthetic/artistic perception, but also from the appearance of serious symptoms of stress on the building fabric.

“The Hellenic ICOMOS expresses its strong opposition to the removal of the character of the museum from the *katholikon* church of the Chora Monastery and the imposition of its function as a place of Islamic worship. Its designation as a World Heritage Site imposes a moral duty on all ICOMOS National Committees and UNESCO to take a stand on this serious issue, and to demand that the Turkish state respects the terms of the World Heritage Convention, to which it is a signatory, and revoke its decision.”

The attribution of the Chora Monastery in Constantinople to Islamic worship was expected, given that the relevant decision of the Turkish State Council was published in 2019, while work on the conversion of the monument into a Muslim mosque had been underway since 2020.

According to the World Heritage Convention, the World Heritage Committee, consisting of 21 elected Member States, is responsible for its implementation. The annual session of the Committee, in which our country presently participates as a member, in the year 2021 and 2023 was limited to making recommendations to Turkey on the potential impact of the change of use on the outstanding universal value of Hagia Sophia and the work carried out in the monastery of the country. This position of the Committee can be interpreted as adoption of the new use of the monuments and as the completion of a bureaucratic procedure without prior discussion and exchange of views.

One of the strategic objectives of the Convention is the active participation of civil society in the processes of protecting World Monuments. The international scientific community was mobilized and expressed views and proposals that were not taken into account either by the Committee or by the UNESCO World Heritage Centre:

The monuments declared World Heritage as museums reflect many historical/cultural phases over the centuries. The change of use marks the priority of one phase over the others which is contrary to the spirit of the Convention as to the universality of cultural heritage.

International normative texts for the protection of cultural heritage state that the restoration of a monument must document

and take into account all aspects of cultural values, without undue emphasis on any value to the detriment of others. Decorative elements are also considered to be integral elements of a monument, while its use, function and intangible values document its integrity and authenticity. Professor Austerhat, the leading authority on the subject, expressed the view that 'The Chora Monastery is a three-dimensional work of art' and to understand its importance one must see it as a whole, as a work where architecture coexists with mosaics and frescoes.



Fig. 4: The *parekklesion*³ of the Chora church holds frescoes of such paramount importance for the development of Byzantine art that it may be dubbed “the Sistine Chapel of Orthodoxy”. Whether it will be opened for Muslim prayers is yet unclear.

Photo source: www.serifyenen.com

The uncontrolled access to Hagia Sophia and the lack of security personnel as well as the non-implementation of UNESCO's recommendations for protective measures on the part of Turkey have already caused irreversible damage to the monument, resulting in the deterioration of its exceptional universal value.

It is proposed that an ad hoc "International Interdisciplinary Committee" be set up by UNESCO with the task of coordinating the various studies and projects on the monuments.

It is considered necessary to inscribe the historic zones of Istanbul on the List of World Heritage in Danger. The zones include other remarkable monuments of various periods that are threatened by abandonment or large-scale infrastructure projects.

The major issue is to clarify whether the change of use of the monuments actually violates the letter and spirit of the World Heritage Convention. If the conversion is indeed in contraven-

tion to the World Heritage Convention, the next question is who may invoke Turkey's international legal responsibility.

As stated in an article by Lucas Lixinski and Vassilis P. Tzevelekos⁴:

"The International Law Commission's (ILC) Articles on the Responsibility of States for Internationally Wrongful Acts, which largely codify customary law, distinguish between injured and non-injured states, enabling non-injured states to invoke a wrongdoer's responsibility if the obligation breached is owed to all other states (*erga omnes* obligations). The right of non-injured states to invoke the responsibility of a state violating obligations *erga omnes (partes)* is well established in the case law of the International Court of Justice, which recently confirmed this right in its January 2020 provisional measures order in *The Gambia v. Myanmar* genocide case.

"The World Heritage Convention's aim is to protect humanity's common heritage. Therefore, all states parties have a legitimate interest in having their common heritage protected and used in conformity with its universal value. Therefore, even as non-injured states, all parties to the World Heritage Convention could claim from Turkey the cessation of the use of Hagia Sophia as a mosque, and as-

surances and guarantees that its non-denominational nature will be preserved in the future."

The "mutilation" of the two monuments undermines the credibility of the World Heritage Convention. It is therefore imperative that the Committee be rid of its political character which is inconsistent with its statutory role, and that the UNESCO World Heritage Centre review policies for the protection of World Monuments which have proved ineffective.

Notes

- 1 The katholikon church of the monastery of Chora and the violation of international conventions. Prot. No. 1610 of 15 May, 2024
- 2 According to Wikipedia, a katholikon church can be the cathedral of a diocese, or a large church in a city at which all the faithful of the city gather to celebrate certain important feasts, or – as in this case – the major church building of a monastery. <https://en.wikipedia.org/wiki/Katholikon>
- 3 A parekklesion (lit. side-church) is a side chapel often found in early byzantine churches which was used for ceremonial and funerary purposes. <https://en.wikipedia.org/wiki/Parecclesion>
- 4 Agia Sophia, Secularism and International Cultural Law, in: American Society of international Law, vol. 24, issue 25 September 22, 2020

Tauric Chersonesos is being Destroyed by the Occupying Russian Authorities

Evelina Kravchenko

Since 2014, some of the sites of cultural heritage of Ukraine has been under Russian occupation. The occupier caused the greatest damage to the only WHS site in Crimea - the ancient city of the Tauric Chersonesos and its *chora*. The site has been under the protection of UNESCO¹ since 2013, located in the city of Sevastopol in Crimea (Fig.1–2).

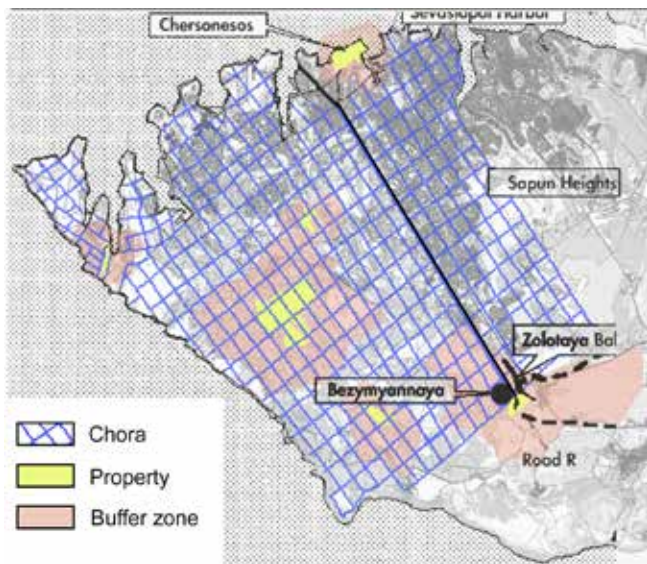


Fig. 1: The Heracleon Peninsula in the South-Western Crimea with the city of the Tauric Chersonesos and its *Chora*

Map: Martin Lenk, with *Chora* by Stephen Tompson (Annual Report, Chersonesos and Metaponto, 2000, p.33)

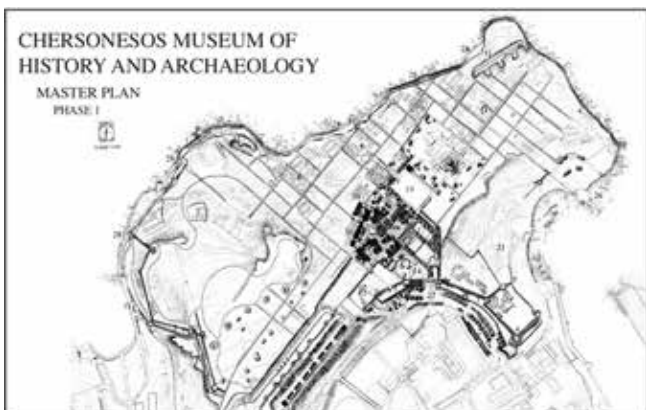


Fig. 2: Plan of the Chersonesos museum from the Annual Report Chersonesos and Metaponto, 2000, p.10.

Plan: Carl Holiday and Alma Maldonado

Tauric Chersonesos was one of the latest ancient Greek colonies, founded in the 5th (according to one version at the end of the 6th) centuries BC on the northern coast of Pontus, and the only Dorian colony. The foundation of Chersonesos around the middle of the 1st millennium BC connected with a number of different factors, the main one being the active trade contacts of the Greeks with the barbarian world of the north of Pontus (Fig.3). The building remains of the city and fortification of the Chersonesos-Kherson and its *chora* (agricultural area) have a unique preservation both for the Northern Black Sea region and for ancient sites in general.

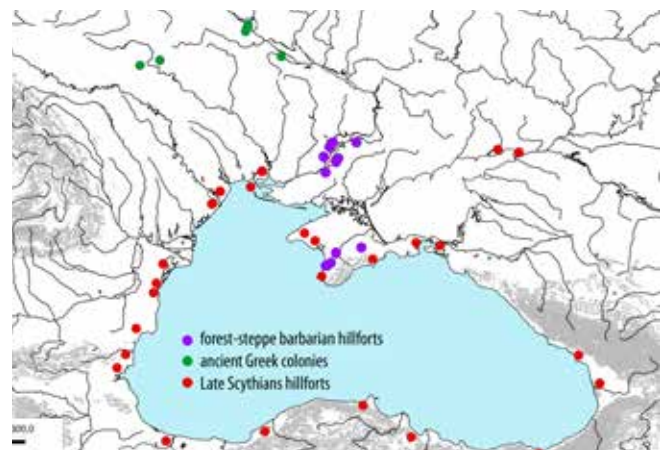


Fig. 3: The Black Sea region with forest-steppe barbarian hillforts, ancient Greek colonies (2) and Late Scythians hillforts (3)

Map: Evelina Kravchenko

The *polis* and the *chora* were designed and built according to a single clearly observed plan, which corresponds to the urban planning concept of Hippodamus of Miletus. In addition, Chersonesos-Kherson throughout its existence was associated with the pervasion of transcultural cult customs and religions. It is connected with evidence of the existence of the cult of the Parthenos or the Virgin, the spread of early Christian ideology even before its official recognition in Rome, the pervasion of Orthodox Christianity (Byzantine observance) after the acceptance and baptism of Kyivan Prince Volodymyr Sviatoslavovych in the process of the acceptance of Rus' and its dynasties into the circle of Byzantine area states.

One of the most important finds in Chersonesos for the world cultural heritage was the Civic Oath of the Chersonesites (IO-

¹ <http://whc.unesco.org/en/list/1411>

SPE, I², 400-402). This document was created in the 3rd century BC during very hard events. The beginning of the 3rd century BC was marked for Chersonesos by appreciable deprivation of territories in the north and east. Therefore, the appearance of this document could be a rethinking of the status of a citizen by the Chersonesites, increased responsibility for their state. On the other hand, this emphasizes the importance of democratic institutions in Chersonesos, makes it not only unique in terms of the architectural decision of the city, but also a wonderful example of ancient democracy, unique in the quality of the public organization of the *polis*. In fact, all this became the basis for granting Tauric Chersonesos the status of a World Heritage Site (Fig. 4).

In the first few years after the occupation, violations by the occupying power of the use of the WHS related to measures of management – the construction of large observation platforms



Fig. 5: The new entrance group near the tower of Zenonos. Photo: Google Maps, 2021

Further measures of the so-called beautification already affected the Volodymyr's Cathedral, which was handed over to the Russian Orthodox Church by the occupation authorities. It was a complex of works on the arrangement of communications and the territory around St. Volodymyr's Cathedral, which

led to the loss of a part of the exhibition area (Fig. 6), a violation of integral archaeological complexes by digging trenches. In the future, this will lead to the destruction of preserved drawings on the walls of a small cistern covered with a special soil mixture (fig.9), which is located near the St. Volodymyr Cathedral. This "beautification" continues until now, and in the future it is predicted that it will be implemented uncontrolled on the entire territory of the ancient city of Chersonesos.

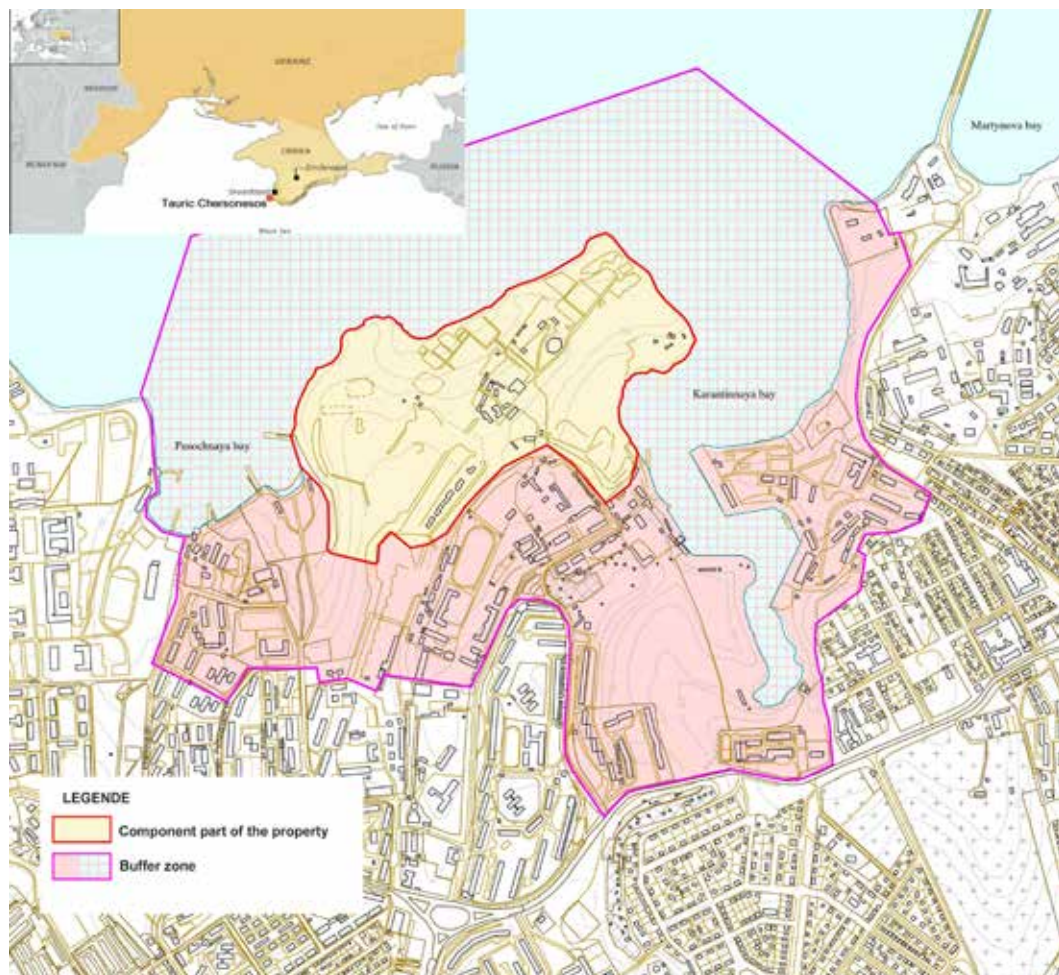


Fig. 4: General Plan of the City of the Tauric Chersonesos (yellow) and buffer zone (pink) by Tymur Bobrovskiy and Larissa Sedikova (Історико-культурні заповідники, 2014).

Map: UNESCO / Martin Lenk

that distorted the authentic appearance of the site, the laying of pedestrian paths with wooden flooring, which were in no way compatible with the traditions of road covering in Chersonesos, where stone or sea pebbles have always been used, the construction of a new entrance group near the tower of Zenonos, etc. (Fig. 5).

light and sound equipment, audience rows weighing dozens of tons lay on the stone remains of the oldest part of Chersonesos, covering all the "pre-Christian" building rests of the city.

The most barbaric crime that could be invented at an archaeological site is its demolition and construction, which happened



Fig. 6: The City of Tauric Chersonesos with the area of the St. Volodymyr cathedral (left center, behind the wall).
Photo: Chris Williams, 2001



Fig. 7: The open-air theatre in the remains of the Roman citadel.
Photo: From the author's collection, 2023

The area of these complexes is part of the Tauric Chersonesos site. It was a territory of a Russian military base before 2014, and just part of this territory is the area of the National Preserve of the Tauric Chersonesos excavated in 2010-2013. In the map of the UNESCO WHS this territory is in the buffer zone (see Fig. 4).

All these works were sanctioned by Russian archaeologists who supposedly conducted research there in an expedition of the Institute of the History of Material Culture of the Russian Academy of Sciences. The expedition was headed by Sergey Solovyov. Specialists of the State Hermitage, the Institute of Archaeology of the Russian Academy of Sciences, Russian universities, and the National Preserve of the Tauric Chersonesos are involved in this. In addition to the fact that the general appearance of the site was disturbed, which led to the distortion of the ancient landscape, tens of thousands of finds excavated by soil works from destroyed suburban complexes were removed from Crimea, other tens of thousands ended up in the modern landfills of Sevastopol, where they were taken by dump trucks from the construction zone. Some of them were picked up from these dumps by local people both for personal storage and for sale on the black market. Thus, soon we will be able to see things from Chersonesos on online auctions.

The executor of these works and the general contractor is the Ministry of Defence of the Russian Federation, the management and financing of the works is carried out by the "My History" fund of the Patriarchal Council for Culture of the Russian Or-

as a result of the construction of the New Chersonese Archaeological Park (Fig. 8). Construction took place on the site of the ancient suburb of Chersonesos which was discovered and explored in 2010–2013, in the southern part of the site. As a result, more than 80,000 square meters of WHS were destroyed. The construction works destroyed the cultural layer, which in some places reached more than 10 meters, the remains of an ancient temple, the city necropolis with unique burial and memorial structures, layers of ash and litter, the remains of suburban complexes of the WHS together with ceramic workshops (*ceramicos*).



Fig. 8: Map of Sevastopol (2024) with National Preserve of the Tauric Chersonesos (between the PISOCHNA and KARANTYNNYA bays) and the area of the so-called Archaeological Park of the New Chersonesos in the buffer zone.
Map: Google / Martin Lenk

thodox Church with the direct participation of Simferopol and Crimea Metropolitan Tikhon (Shevkunov). The museum-preserve (the Russian administration of the WHS) itself, as a new structure created on the site of Tauric Chersonesos, headed by the former director of the St. Petersburg Waterworks Elena Morozova, does not interfere with the construction work and is going to soon move all its departments to the buildings of the New Chersonesos Archaeological Park.

In January 2024, the occupation authorities and the Russian Orthodox Church announced the so-called renewal of the monastery in the buildings of the National Preserve of the Tauric Chersonesos (Fig. 9).²



Fig. 9: Consecration of the St. Volodymyr male monastery of the Russian Orthodox Church on the territory of the National Preserve of the Tauric Chersonesos.

Photo: From the author's collection, January 2024

This means that the National Preserve of the Tauric Chersonesos will be evicted from all its buildings to newly built ones on the destroyed part of the site.

Actually, the authentic museum was turned into a monastery³, the most valuable things were exported to the Russian Federation⁴, the evidence and building remains of the ancient democratic *polis* were closed for exhibition, they are under the open air theatre⁵. Instead, a fake was created - the so-called New Chersonesos, which will shine with gold and new paint, with smooth green lawns, fountains, Chinese bridges and a tem-

ple with a dome that will open like in James Bond movies (Fig. 10–12).



Figs 10–12: Buildings and streets of the archaeological park of the New Chersonesos.

Photos from the author's collection, 2022-2024

² The St. Volodymyr monastery of the Russian Orthodox Church was created on the area of the Tauric Chersonesos site in the middle of the XIX century and functioned till 1924, when it was closed by the Communist power of the RSFSR. The buildings of the monastery were handed to the museum of Chersonesos. The St. Volodymyr cathedral was destroyed in World War II and reconstructed by the Kyiv community in its own foundations at the beginning of the 2000s. The monastery was not built until 2024.

³ https://zaxid.net/hersones_nerizdyvana_istoriya_n1577581?fbclid=IwZXh0bG9hZWF0cmTEAAR3k2J-n5XhNMPGS81F_JrbswpM0S0r0vd2oi94S9MO-5s9eVvs2OR3ZZct4_aem_AasDtY8c5HUf9gzPGf7h8c7jqkiWH45vV0d-qsv-1Ogrm1vQNerDHC-R3OVcMeCkPPLVOqae5iTLsBnQHb-S62FV

⁴ <http://vgosau.kiev.ua/novyny/arkheolohichna-spadshy-na-na-okupovanykh-terytoyakh/1351-vyvezennia-arkh-tsinnoitei-kherones?fbclid=IwAR3WiiTLQ7VDEkknQ6bzt7JUt5XF6wLw92CSM59GI-9JrYVSLzaFeAMwJHvA>

⁵ https://zaxid.net/yak_rosiyani_znishhuyut_hersones_tavriyskiy_n1568258

How does this correlate with Russian legislation? The fact is that after the occupation, the authorities of the Russian Federation refused to recognize the Ukrainian documentation for the WHS and accepted by UNESCO for registration. Instead, new documentation was created for the site of Tauric Chersonesos, and a number of examinations were conducted to approve such works on the site. Acts of conducting "expert" work were signed by a number of archaeologists known outside Crimea - Yuriy Zaitsev, Igor Khrapunov, and the archaeological research that became the basis for these acts was carried out by Ludmila Kovalevska and Emil' Seydaliev.

Thus, not only the laws of Ukraine on the protection and management of archaeological and cultural heritage were violated, but also international documents, in particular the management plan of the site, the requirements of UNESCO regarding the coordination of all landscape transformations around the site and work on the site and buffer zone.

What about the restoration? Russia has not changed its approach to the restoration of cultural heritage objects since the time of the USSR. They consisted not so much in preserving the object in its historical authentic form, but in giving the object an attractive appearance. Thus, the Soviet restoration allowed the complete reconstruction of the cultural heritage object. As it happened with Gostynnyi Dvir in Kyiv, after which the building took on a different appearance and almost completely lost its authenticity, which eventually led to its current state of ruin. Modern world requirements for restoration are based on measures to preserve the site and minimize any changes to it. Russian requirements for this process remained at the level of the 80s of the Russian Soviet Federative Socialist Republic.

In Chersonesos, after the destruction of the suburb during the construction of the New Chersonese Archaeological Park, the occupiers decided to restore some of the unique archaeological sites, which miraculously did not die under the bucket of the excavator, in a new place. In particular, we are talking about the ancient suburb sanctuary – the *heroon* – and the temple on *antus* (Fig. 13–14). And as Sergey Solovyov, the direct leader



Fig.s 13 and 14: The Russian archaeological team near the excavation of *heroon* and temple of *antus* and deconstruction of these objects in a new square of so-called archaeological park of the New Chersonesos. Photos: From the author's collection, 2022-2024

of these so-called archaeological researches, noted in a recent interview with Russian propagandists, the Russians rebuilt these objects even better than the Greeks. Actually, this statement contains all the tragedy of the situation and of Russian culture as a whole: Russians for some reason are sure that everything done before or without them is bad.

Despite the fact that during the construction of the archaeological park of New Chersonesos, millions of archaeological objects were obtained that required laboratory processing and restoration, not a single new restoration workshop was created in Crimea by the occupation authorities. Most of the objects were sent to Moscow and St. Petersburg for restoration, their status is unknown. The rest was restored and conserved in Crimean workshops, the best of which were built and equipped in the National Preserve of Tauric Chersonesos until 2014, in particular, the Packard Laboratory, which was created at the expense of the Packard Humanitarian Foundation (USA) within the scope of an international project of the Institute of Classical Archaeology of the University of Texas, headed by Prof. J. Carter.

All these violations, which led to catastrophic consequences for the World Heritage site, became possible due to non-compliance with the international legislation ratified by the Russian Federation on the protection of cultural property, in particular during armed conflict (the 1954 Hague Convention on the Protection of Cultural Property during Armed Conflict, the 1970 Convention on the Means of Prohibiting and Preventing the Illicit Import, Export, and Transfer of Ownership of Cultural Property, etc.), the archaism of the conceptual foundations of the Russian legislation itself, as well as the exceptionally high level of corruption in the Russian Federation, when no laws affect the personal whims of the top leadership of the state and its entourage.

The recent situation around the Tauric Chersonesos WHS, with military bases located near the site,⁶ is dangerous and assumes to recommend the inscription of this site to the List in Danger, so as to ask question about modernization the procedures of UNESCO monitoring mission and changes the system of monitoring according hi-tech decisions. The activities of the Russian Federation in the Tauric Chersonesos devaluated the protection of cultural heritage and has put this state party outside this process.

⁶ https://zaxid.net/na_teritoriji_hersonesa_tavriyskogo_okupanti_buduyut_vyskoviy_navchalniy_tsentr_n1571700?fbclid=IwZxh0bgNhZW0CMTEAAR1bl-clFh2m6I9ZK76kf5nj-1zOnaO93AAAEv7eejmMsmMPsHZZprbpG444_aem_AasTC6xFYg3VUUWaQvll3pgN96o61VeD6hd30-PEPmtp5LUvGe8O2crUtM-KPsMd9E-p-k4pWYDps-vUEmVtT126X9

Community Management After Recent Damages at Petra Archaeological Park, Jordan

Maria Elena Ronza and Samah Jazi Faisal Al Khasoneh,
Sela for Training and Protection of Heritage



Community management at the World Heritage Site (WHS) of Petra, Jordan, has been a collaborative effort since its inscription in 1985. UNESCO, in partnership with national and international stakeholders, has diligently worked to safeguard the

itself. There is often a dichotomy in the management of WHSs, which highlights the concept of living heritage in the so-called "First World" whereas Third World's WHSs are often expected to preserve a crystalized past and the opportunity to grasp the local perspective is often missed. The preservation of Petra requires both preventive and intervention measures to be implemented with the active participation of the local communities living in the surroundings of the site.

In early December 2023, the Petra Development and Tourism Region Development Authority (PDTRA) took proactive measures to address unauthorized commercial activities and site occupation. Regrettably, these actions resulted in tensions between local communities, particularly the Bdoul, and the local authorities, causing unintended damages to the archaeological site. Following these incidents in December 2023, PDTRA has initiated a series of efforts to engage the local communities. One such initiative involves the renewal of the training program conducted by Sela for Training and Protection of Heritage that aims to form and involve local communities in the management and preservation of the site, offering an alternative to its commercial exploitation.

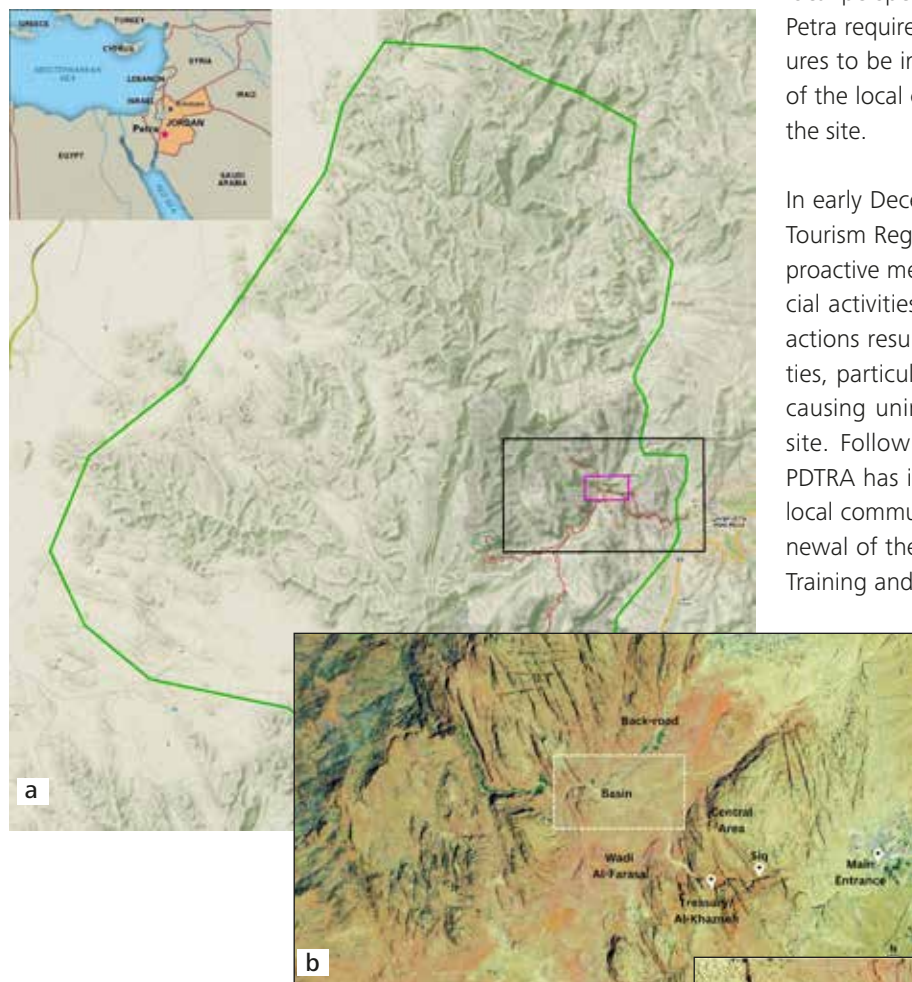


Fig. 1: Map of the inscribed Petra World Heritage property (a), with the heritage area (b) and the sites recently damaged (c).

Maps: (a) UNESCO / WHW, (b) and (c) SELA / WHW

site's Outstanding Universal Values (OUV). However, the management and protection of both the archaeological site and the communities in its vicinity face significant challenges due to urban development, commercial exploitation, and mass tourism.

The 2019 Petra Integrated Management Plan recognizes the local communities as a vital component for the survival of Petra's ecosystem and proposes a participatory approach through community engagement that started with preparing the plan



Moreover, PDTRA, in collaboration with Sela, launched a database in December 2023 to collect information regarding the state of conservation of the monuments in Petra. This database includes routine monitoring data by PAP to identify potential threats and incidents of vandalism. It also encompasses information about all conservation interventions on-site, evaluating results at regular intervals to identify and promote best practices.

After the December 2023 incidents, PAP staff produced a preliminary report outlining damages and an emergency plan. The proposed interventions include assessing affected monuments, inventorying and assessing the state of conservation of artifacts, cleaning rubble, and safe removal and transportation of artifacts for conservation. Here is an abstract from the report:

“The site of Petra has recently been subjected to severe vandalism as a result of the removal of illegal stands and shops inside the archaeological park [...]. This assessment was conducted on the 12th and 13th of December by a committee of Petra Archaeological Park (PAP)’s employees led by Ms. Wajid Alnawafleh as soon as the site was declared safe after the accidents that occurred between the 4th and the 7th. The following facilities and monuments were set on fire:

- [...]
- o The toilettes booth adjacent to the Urn Tomb stairs.
- o The ancillary room of the Byzantine church and part of the shelter.
- o Part of the Temenos Gate.
- [...]



Fig. 2: Burned visitor’s facilities. Photo: Sela for Training and Protection of Heritage



Fig. 3: Burning residues at Temenos Gate. Photo: Sela for Training and Protection of Heritage



Fig. 4a, b: Fire residues at the Byzantine church after emergency intervention. Photo: Sela for Training and Protection of Heritage

Proposed interventions

1. Full assessment of affected monuments
2. Inventory and assessment of the state of conservation of the affected artefacts
3. Cleaning of the rubble and safe removal and transportation of all artefacts to storages outside the archaeological site for conservation.
4. Cleaning of the stone surfaces affected by the soot deposits, using EDTA in poltice – mixed with ammonium carbonate if needed.
5. Replacement of the damaged shelter parts at the Byzantine church.
6. Cleaning of the damaged artefacts.

Following the first aid interventions and cleaning and full documentation of the state of conservation, it will be possible to

define further needed interventions. Hereby we propose to engage a team of 18 junior conservators and 2 senior conservators for 3 months to complete the documentation, the inventory and the assessment of the damaged structures, supervise the removal and transportation of the artefacts to safe storage facilities, and proceed with cleaning and consolidation operations.”

Sela and PDTRA sought support from international donors for conservation interventions. For community management, a comprehensive awareness-raising strategy could positively impact future community interactions with the site. In terms of conservation, short-term funds are required to address recent damages, while long-term investment in creating jobs for trained community members can contribute to sustainable change in site preservation.

What do we Know About the Sites on the Tentative List for World Heritage in Gaza?

While several reports have covered the widespread destruction of cultural heritage in the Gaza Strip,^{1,2,3} this report tries to assemble available information on the condition of the three sites on the Tentative List of the Palestinian Authority for World Heritage nomination.

As visiting the sites and thus a first-hand inspection have not been possible since January 2024, we have relied on news coverage and information received through the WHW network. We would like to thank in particular Heritage for Peace, Emek Shaveh and Prof. Olivier Poquillon for their support of our efforts.

The editor

As the only sheltered natural harbor between Sinai and Lebanon, Gaza has historically been a crossroads of civilizations and a hub of the incense trade, attracting Egyptians, Persians, Greeks, Romans, and Ottomans. This culturally significant yet densely populated is home to three sites on the tentative list for UNESCO World Heritage.

These are the Anthedon Harbor, Tell Umm Amer and the Wadi Gaza Coastal Wetlands. However, preservation of heritage sites in Gaza faces significant challenges.⁴ Restrictions on importing conservation materials require Israeli permission, and limited space due to overpopulation has led to the construction of essential infrastructure over historic sites.^{5, 6}

Tell Umm Amer (Monastery of St Hilarion)

Nestled among the coastal dunes 8.5km south of Gaza City, Tel Umm Amer, also known as the Monastery of St. Hilarion, features remains from the late Roman Empire to the Umayyad Period. Located in the village of Al Nusairat, this site has been on UNESCO's Tentative Heritage List since 2012.

Founded around 400 CE, it was one of the largest Christian Monasteries in the Middle East. Dedicated to St. Hilarion, a native of Gaza and the father of Palestinian monasticism, this extensive site includes two churches, a burial site, a baptism hall, a public cemetery, an audience hall, dining rooms and public



Fig. 1: Location of sites on the Tentative List for World Heritage in Gaza

Map: Sayali Athale

baths. The monastery served pilgrims and merchants traveling from Egypt to the Holy Land.⁷ It was damaged by an earthquake in the seventh century and remained abandoned until local archaeologists began excavating the ruins in 1999.⁸

The site was included in Palestine's tentative list of World Heritage in 2012 for its cultural, religious, and historical importance. In 2020 ALIPH, the international alliance for the protection of heritage in conflict areas, conducted a project at the monastery.⁹ The British Council has also supported its preservation.¹⁰

UNESCO had been concerned about the site's conservation even prior to Hamas' attack on Israel due to inadequate policies to protect heritage and culture.¹¹ While some media agencies believed the site to be unaffected by bombing till the end of November 2023,¹² UNESCO granted provisional enhanced protection to Saint Hilarion Monastery on 14 December 2023 following reports that it had sustained damage during Israeli bombing.¹³ In December 2023, Jihad Yasin, the Palestinian general director of excavations and museums stated that they were not certain if the monument itself was damaged even though its surrounding areas, such as the roads to the site, were affected¹⁴.

According to one report,¹⁵ the warehouse of the monastery which stored antiquities, supplies, and tools, was apparently broken into by Palestinians but they seem to have left behind archaeological artifacts.

Since January 2024, some sources reported damage to the monastery.¹⁶⁻¹⁷ On 21 January 2024, several videos showing Israeli soldiers in possession of plaques from St. Hilarion surfaced on Instagram.¹⁸ On the same day a video posted by Eli Escusido, head of Israel's Antiquities Authority showed the deputy director of the Antiquities Authority walking around the warehouse.¹⁹ It is uncertain whether the items in the warehouse, originating from the St. Hilarion site, would be covered under UNESCO's protocol for provisional enhanced protection.²⁰ However, according to the article that reported the above, the built heritage of St. Hilarion seems to have been spared.²¹

A Palestinian archaeology activist, Fadel Al-Otol, took photos of the site on 5 May 2024. A French expert on the site, Prof. Olivier Poquillon, concluded that these images showed no warfare-related damage, only minor damages due to winter.



Fig. 2: Excavated site of the St. Hilarion Monastery

Image: Fadel Al-Otol



Fig. 4: Mosaic floor at the St. Hilarion Monastery

Image: Fadel Al-Otol



Fig. 3: Mosaic floor at the St. Hilarion Monastery

Image: Fadel Al-Otol



Fig. 5: Architectural remains of the St. Hilarion Monastery

Image: Fadel Al-Otol



Fig. 6: Archeological remains of the St. Hilarion Monastery Image: Fadel Al-Otol

Anthedon Harbour

Along the Gaza Strip coastline lies one of Palestine’s most significant archaeological sites. Anthedon, locally known as Tida or Blakhiyeh, was the first seaport of Gaza and was inhabited between 800 BC and 100 AD. In response to increasing urban encroachment on the site, emergency excavations from 1995 to 2005 uncovered various elements, including an Iron Age defensive wall beneath Achaemenid period houses, Roman and Hellenistic structures like an emporium and tiled fountain, and a Byzantine cemetery in the north. Inland, archaeologists discovered remarkable artifacts from the Greco-Roman period, including the Roman city wall, villas, and Hellenistic houses with Mediterranean-influenced painted decorations.^{22 23 24}

In 2012, the Permanent Delegation of Palestine to UNESCO submitted Anthedon Harbour to its Tentative List citing its outstanding universal value as a “rich socio-cultural and socio-economic interchange between Europe and the Levant.” Anthedon’s existence has been threatened by a combination of factors.

In 2013, Hamas reportedly bulldozed parts of the site to build a military training camp.²⁵ Since then, it has been affected by repeated Israeli bombings, humanitarian crisis due to the Israeli occupation and siege in Palestinian communities, advancing coastal erosion, and the required development amid Gaza’s densification.²⁶

Satellite imagery analyzed by Forensic Architecture (FA),²⁷ a research agency based at Goldsmiths, University of London reveals numerous large craters resulting from repeated Israeli bombings in 2012, 2014, 2018, and 2021, causing incremental damage to the site. Parts of the recognized archaeological site are occupied by a Palestinian police station and a military facility, and bombing has affected remnants near a mosque and residential area of the Al-Shati refugee camp and the coastline.

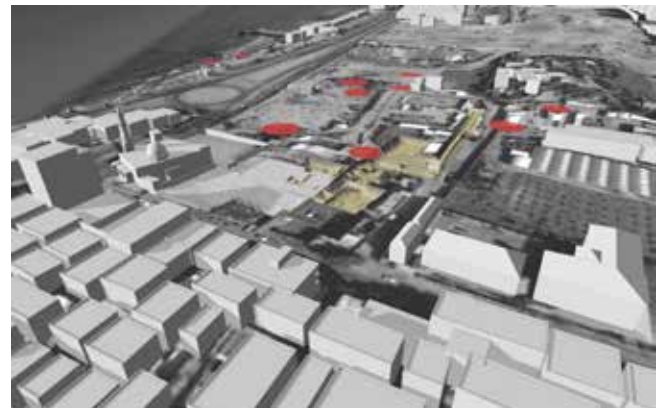


Fig. 8: The red circles indicate evidence of damage on or near the site. Image: Forensic Architecture, 2022. Satellite Image: © CNES (2018), Distribution Airbus DS/Spot Image

Several reports claiming that Anthedon harbor, already endangered by prior bombings and siege, has now been completely destroyed,^{28 29 30 31} did not specify details or the timing of the alleged destruction. No eyewitness account of the situation on



Fig. 7: Map indicating the extent of the excavations undertaken from 1995-2005.

Image: Forensic Architecture, 2022; Satellite Image: © CNES (2018), Distribution Airbus DS/Spot Image

the site has come to our attention. Mr. Fadel Al-Otol has not managed to reach the site and cannot be reached at the moment. As the only reliable source, FA and Al-Haq³² published an analysis of the damages on the site on December 19, 2023, based on satellite image interpretation correlated with earlier archaeological findings on the site.

Forensic Architecture concluded that destruction of the site up to December 9, 2023, occurred in three phases: airstrikes, surface-level demolition, and the installation of water pumps to flood underground tunnels.³³ Satellite imagery captured between October 8, 2023, and the onset of the Israeli ground invasion in November revealed extensive damage to the archaeological site, with more than 30 craters ranging from 8 to 16 meters in diameter caused by airdropped ammunition.³⁴ Since most of the site is unexcavated, however, it is impossible to determine the extent of damage inflicted on the site.

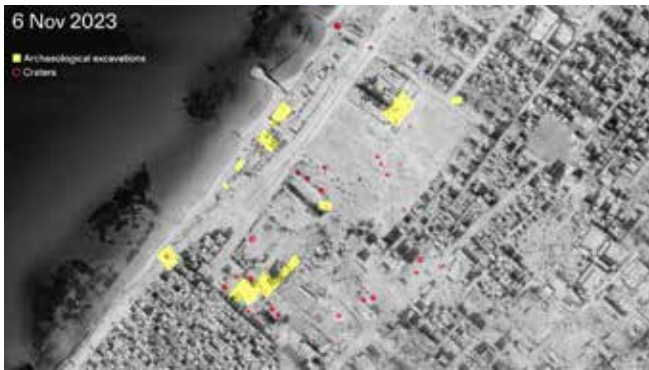


Fig. 9: Satellite images from 6 November 2023 indicating the location of craters (red) and excavated archaeological sites (yellow).
Image: Forensic Architecture, 2023; Satellite Image: © Planet Labs PBC, 2023.

Following the ground invasion, the area underwent significant transformation, resembling a military outpost, likely facilitated by large vehicles such as military bulldozers and tanks. By December 10, 2023, satellite imagery identified over 35 vehicles, many of them armed, on the site. Remote sensing data since October 8, 2023, highlighted significant ground disturbances



Fig. 10: Satellite image from 10 December 2023 of large/armed vehicles.
Image: © Forensic Architecture, 2023. Satellite image: © Planet Labs PBC, 2023.

indicating that the earth disturbed and overturned by Israeli military activity, could contain damaged archaeological remnants and artifacts previously buried underground.

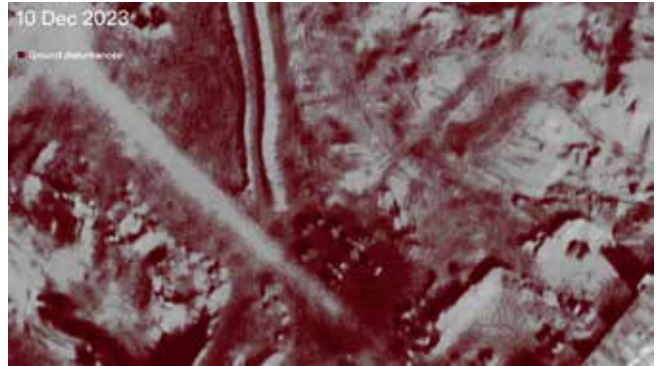


Fig. 11: Satellite image from 10 December 2023 analysed using remote sensing to register ground disturbances. Darker red indicates greater changes in terrain.
Image: © Forensic Architecture, 2023. Satellite image: © Planet Labs PBC, 2023.

On December 13, 2023, the Israeli Defense Forces allegedly initiated the flooding of tunnels beneath Gaza with seawater. Satellite imagery spanning from October 8 to December 10, 2023, depicted the establishment of Israeli water pump infrastructure in and around the archaeological site. However, any impact of this installation remains unclear.



Fig. 12: Satellite image from 14 November 2023 of water pump infrastructure.
Image: © Planet Labs PBC, 2023.

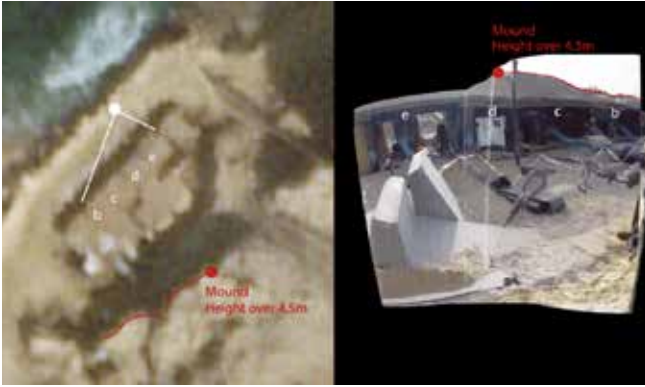


Fig. 15: Satellite image from 14 November 2023 of water pump infrastructure.
Image: © Planet Labs PBC, 2023.

Wadi Gaza Coastal Wetlands

The Wadi Gaza Coastal Wetland is a unique natural area recognized for its high biodiversity. This wetland serves as an important stopover for migratory birds traveling between Africa and Eurasia, making it a critical habitat for species such as ducks, herons, storks, cranes, and the endemic Palestinian sunbird. The wetland is characterized by a mix of fresh and saline waters, supporting both terrestrial and aquatic bird species.

The Wadi Gaza faces severe environmental threats, including pollution, urban encroachment, and the dumping of sewage and solid waste from central Gaza refugee camps, which compromise the wetland's health and biodiversity. Efforts have been made to protect this area; it was declared a nature reserve in 2000, emphasizing the need for sustainable land use and environmental conservation. In 2012 it was added to Palestine's tentative list of World Heritage sites³⁵.

Scant information is available online about the current condition of the only natural property in Gaza on Palestine's tentative World Heritage List. The Art Newspaper reports how this natural heritage site has been directly and indirectly affected by the ongoing military attacks.³⁶ By monitoring satellite imagery, researchers have observed bombardments on or near archaeological sites along the coast and near Wadi Gaza. The United Nations Office for the Coordination of Humanitarian Affairs (OCHA) reported in mid-November 2023 that fuel shortages had shut down sewage pumping stations, causing raw sewage to flow into streets in some areas. According to OCHA at that point, over 130,000 cubic meters of wastewater were being discharged into the Mediterranean daily.³⁷ According to The Art Newspaper³⁸ this sewage crisis had extended to the Mediterranean and the Wadi Gaza coastal wetlands, which span from east Gaza to the coast, discharging into the sea. An enquiry by them to OCHA for confirmation on the status of sewage plants and pumping stations affecting the Wadi Gaza received no response.

Notes

- <https://www.heritageforpeace.org/wp-content/uploads/2024/01/Report-on-the-Impact-of-the-Recent-War-in-2023-on-the-Cultural-Heritage-in-Gaza-Strip-Palestine-English.pdf>
- https://www.theguardian.com/world/2024/feb/04/everything-beautiful-has-been-destroyed-palestinians-mourn-a-city-in-tatters?fbclid=IwAR1K-A1D1D1DOE_-fljab6NQTW71Ao_vLEugDyOKqU-vWr4gPF01Tjy3exXw
- <https://www.unesco.org/en/gaza/assessment>
- <https://www.theartnewspaper.com/2023/11/28/bombing-of-gaza-has-damaged-or-destroyed-more-than-100-heritage-sites-ngo-report-reveals>
- <https://www.theartnewspaper.com/2023/11/28/bombing-of-gaza-has-damaged-or-destroyed-more-than-100-heritage-sites-ngo-report-reveals>
- <https://newlinesmag.com/reportage/the-past-is-being-destroyed-in-palestine-as-well-as-the-present/>
- <https://whc.unesco.org/en/tentativelists/5716/>
- <https://www.dailymail.co.uk/sciencetech/article-12649597/The-archaeological-sites-risk-wiped-Israeli-Palestinian-conflict-oldest-Christian-Church-Gaza-unprecedented-Roman-necropolis-containing-130-tombs.html>
- <https://www.aliph-foundation.org/en/projects/protection-preservation-and-promotion-of-palestinian-cultural-heritage-in-the-gaza-strip>
- <https://www.britishcouncil.org/arts/culture-development/cultural-protection-fund/projects/gaza-strip>
- <https://www.unesco.org/en/articles/gaza-unesco-grants-enhanced-provisional-protection-saint-hilarion-monastery>
- https://www.arabnews.jp/en/middle-east/article_119835/
- <https://www.unesco.org/en/articles/gaza-unesco-grants-enhanced-provisional-protection-saint-hilarion-monastery>
- <https://www.theartnewspaper.com/2023/11/28/bombing-of-gaza-has-damaged-or-destroyed-more-than-100-heritage-sites-ngo-report-reveals>
- <https://newlinesmag.com/reportage/the-past-is-being-destroyed-in-palestine-as-well-as-the-present/>
- <https://www.aljazeera.com/news/2024/1/14/a-cultural-genocide-which-of-gazas-heritage-sites-have-been-destroyed>
- <https://www.palestine-studies.org/en/node/1655264>
- <https://newlinesmag.com/reportage/the-past-is-being-destroyed-in-palestine-as-well-as-the-present/>
- <https://newlinesmag.com/reportage/the-past-is-being-destroyed-in-palestine-as-well-as-the-present/>
- <https://newlinesmag.com/reportage/the-past-is-being-destroyed-in-palestine-as-well-as-the-present/>
- <https://newlinesmag.com/reportage/the-past-is-being-destroyed-in-palestine-as-well-as-the-present/>
- <https://whc.unesco.org/en/tentativelists/5719/>
- <https://www.palestine-studies.org/en/node/41977>
- <https://forensic-architecture.org/investigation/living-archaeology-in-gaza>
- <https://apnews.com/article/77262abf033f48efb007bc8c0f1353ea>
- <https://forensic-architecture.org/investigation/living-archaeology-in-gaza>
- <https://forensic-architecture.org/investigation/living-archaeology-in-gaza>
- <https://www.theartnewspaper.com/2023/12/22/gaza-city-archives-among-heritage-sites-destroyed-in-israel-hamas-war>
- <https://www.aa.com.tr/en/middle-east/-erasure-of-history-israel-s-cultural-genocide-decimates-gaza-s-archaeological-treasures/3144001>
- https://www.lemonde.fr/en/international/article/2024/02/14/israeli-bombs-are-wiping-out-gaza-s-heritage-and-history_6524666_4.html#
- <https://www.arabnews.com/node/2416371/middle-east>
- <https://www.alhaq.org/>
- <https://forensic-architecture.org/investigation/living-archaeology-in-gaza>
- <https://forensic-architecture.org/investigation/living-archaeology-in-gaza>
- <https://whc.unesco.org/fr/listesindicatives/5722/>
- <https://www.theartnewspaper.com/2023/12/22/gaza-city-archives-among-heritage-sites-destroyed-in-israel-hamas-war>
- <https://un.dk/gaza-lack-of-fuel-threatening-to-shut-down-entire-humanitarian-operation/>
- <https://www.theartnewspaper.com/2023/12/22/gaza-city-archives-among-heritage-sites-destroyed-in-israel-hamas-war>

The Destruction of the St Catherine Area, South Sinai, Egypt

John Grainger, Joseph Hobbs, Mohammed Sabry and others¹

Decision 26 COM 23.5 of the World Heritage Committee inscribed the 601 sq km Saint Catherine Area based on cultural criteria (i), (iii), (iv) and (vi). These Cultural Criteria relate mainly to the architectural, artistic and monastic traditions of the Monastery, but the values of the surrounding landscape are recognised also as highly significant, with ICOMOS' reference to the Monastery's "domestic integration into a rugged landscape", its location "in a remote area" and the "intimate relationship between natural grandeur and spiritual commitment" (ICOMOS Advisory Body Evaluation 2002). In the same evaluation, the Statement of Significance states "Its (i.e. the Monastery's) siting demonstrates a deliberate attempt to establish an intimate bond between natural beauty and remoteness on the one hand and human spiritual commitment on the other".

It is apparent that the integrity of natural landscapes in this large Cultural Site is central to the maintenance of its Outstanding Universal Values (see Fig. 1). Indeed in 2003 the WH Committee encouraged the State Party to resubmit the nomination as a Cultural Landscape.²

At the time of the St Catherine Area's inscription and on occasions since, the WH Committee has invited the State Party to prepare a visitor-management plan for the Monastery and to implement the 1998 sustainable development plan for the town of St Catherine.³

Until 2021 neither of these requests had been implemented by the State Party. If the plans had been implemented when requested, the impacts of the Great Transfiguration Project (GTP)

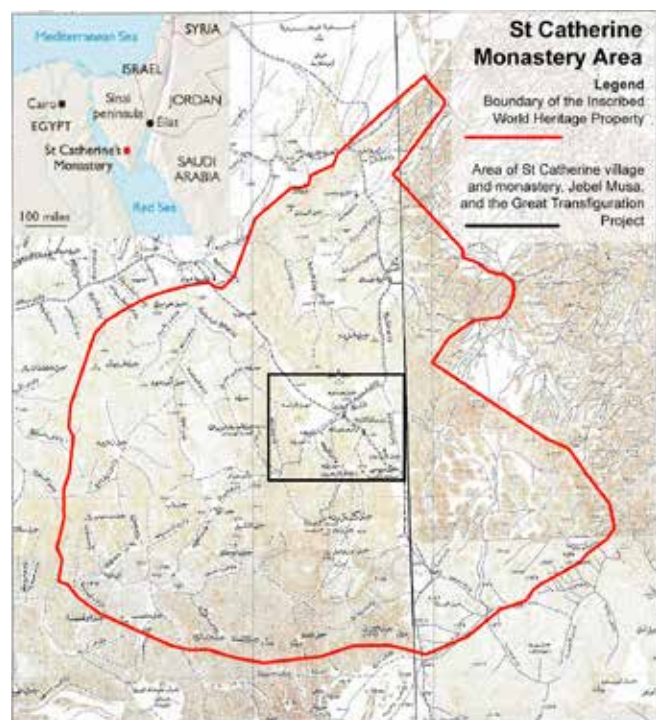


Fig. 1: Map of the inscribed World Heritage property of the St Catherine Monastery Area with the area of the Great Transfiguration Project, the St Catherine monastery and village, and Mount Sinai (Jebel Musa).
Map: UNESCO / WHV

to the Site's OUV could have been avoided along with some of the negative socio-economic effects on the local Bedouin community.

The "Great Transfiguration Project"

In March 2021, the Egyptian Ministry of Housing, Utilities and Urban Communities announced the GTP to build a massive tourism project in the core of the St Catherine Area World Heritage site (Figs 2, 3, 4 and 5). Now cynically renamed "The Great Revelation Initiative", it has involved 14 construction projects involving hundreds of buildings over thousands of square metres with 400 chalets, 530 chalets and villas, 5 hotels, an eco-lodge of 200 rooms and a new residential area of 700 units.

The scale of the project is massive with the deployment of several thousand construction workers, outnumbering the resident Bedouin population. A project of this scale is having deleterious impacts in other parts of the WH Site with the huge demand

¹ This paper reflects the concerns and views of a group of individuals who have close and long-standing involvement at Saint Catherine and have, collectively and independently, sent reports, alerts and petitions to UNESCO, ICOMOS and other organisations over the last two years. Unfortunately, as none of the group has been able to personally access the Site recently, we are unable to undertake detailed assessments, so this report is based on our innate knowledge of the Site, other reports and recent anecdotal information.

The group includes Dr Joe Hobbs – author of *Mount Sinai*; Mohammed Sabri – author of *Sinai: Egypt's Linchpin, Gaza's Lifeline, Israel's Nightmare*. Others choose not to be named to avoid compromising their ongoing involvement in St Catherine. The group also speaks on behalf of some of the local community in St Catherine, who don't have a public voice, including the monks in the Monastery.

² Decision 27 COM 8C.16

³ 2002 Decision 26 COM 23.6, 2004 Decision 28 COM 15B.51.



Fig. 2: General Layout of Great Transfiguration Project showing development in Ar Raha (1,2 3 & 4) with reference to the Monastery of St Katherine.
Image from Government of Egypt official planning documents for the "Great Transfiguration Project" (GTP)



Fig. 3: Model of a section of the GTP (no. 1, 2 and 3).
Image from Government of Egypt official planning documents for the "Great Transfiguration Project" (GTP)



Fig. 4: Rendering of Tourism infrastructure for GTP in Ar Raha Plain.
Image from Government of Egypt official planning documents for the "Great Transfiguration Project" (GTP)

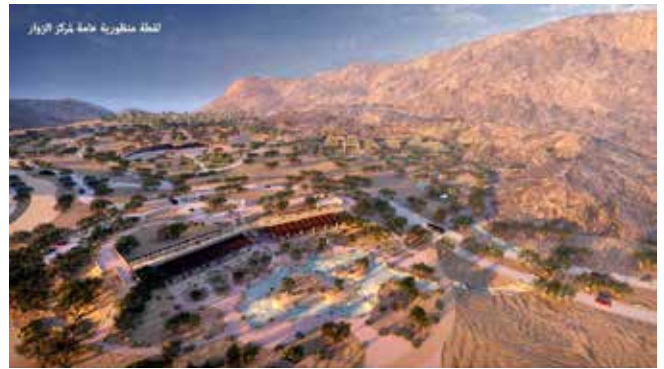


Fig. 5: Rendering of Architectural Design for GTP Visitor Centre in Ar Raha Plain.
Image from Government of Egypt official planning documents for the "Great Transfiguration Project" (GTP)

for building aggregates and stone facing materials. There is a new road being cut through Wadi Hebran, one of the Protectorate's most scenic and biodiverse wadis (Fig. 6).



Fig. 6: Wadi Hebran. Photo: Ben Hofler

This road is now being continued into the WH Site, through the traditional pilgrim route into Ar Raha plain (see below) to shorten access to the tourism project located on the lower part of Ar Raha plain directly facing Wadi El Dier and the Monastery (Figs 7 and 8).

The 2021 UNESCO Advisory Mission to Egypt did not visit the property, but it would have been clear then that there was



Fig. 7: New road cut through Wadi Hebran to the GTP. Photo: Anonymous



Fig. 8: Map of the new road through Wadi Hebran to the GTP.

Source: Master Plan for Wadi El Deir Proposal for the Creation of "Wadi El Deir Archaeological Park", published by The Holy Monastery of Saint Catherine, Mount Sinai, 2010

PAMU Initiatives relevant to WH Status

Early in the Protectorate's establishment in 1996, the Protected Area Management Unit (PAMU) initiated the two important actions with major implications for the World Heritage nomination.

A Sustainable Urban Plan for St Catherine was developed by PAMU in 1997 to control and orientate expansion while conserving the Bedouin character of this mountain town. It was formalised by the General Organisation of Physical Planning (GOPP) and endorsed by the Governor and Ministry of Housing in 2000. The concept was a twin node strategy, with all new development

no consultation with the local communities or the Monastery ahead of the project as required in the Site's inscription, but simply the presentation of the project to parties after its inception.

sited away from the town area and Ar Raha plain (see Figure 9). An integral feature of the Plan was the establishment of "Cones of Vision" where no development would be permitted to preserve historical vistas, such as between Ar Raha and the Mon-

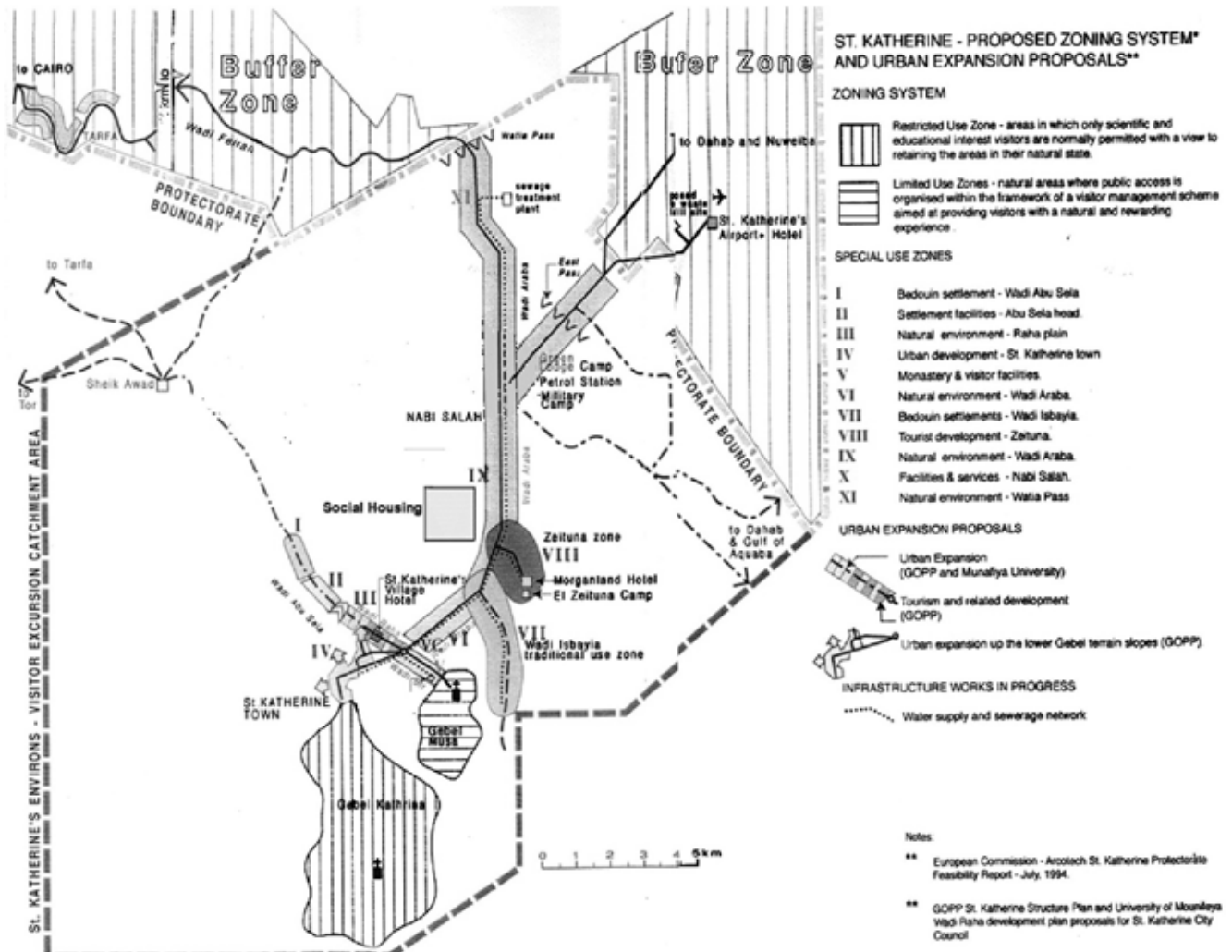


Fig. 9: St Katherine proposed Zoning System and Urban Expansion Proposals.

Source: Master Plan for Wadi El Deir, PAMU 1997

astery, and the views of Ras Safsafeh, and Wadi Isbayia from Mt Sinai. The vista connecting Ar Raha and the Monastery is particularly important. The plain of Ar Raha (The Resting Place) is venerated as the place where the Israelites waited for Moses



Fig. 10: "The convent of St. Catherine Mount Sinai looking towards the plain of the encampment Feby 21st 1839". Lithograph by David Roberts.
Image source: <https://www.loc.gov/item/2002717561/>

to return from Mt Sinai. For centuries the trail across Ar Raha was the traditional approach to the Monastery by pilgrims and travellers from Suez and the scenic qualities has been long commemorated by travellers such as David Roberts (see Fig. 10) and E.H. Palmer:

"The (Monastery) wall which faces you at the top of the first flight is pierced with loopholes through which fine little glimpses may be caught of the mountains and the magnificent plain of Er Raha beyond". The Desert of the Exodus. E.H. Palmer 1871

Until recently, this vista has been largely conserved (Fig.s 11 and 12), and the protection of this "cone of vision" and that from Mt Sinai, were incorporated into the EU-funded Monastery's 2010 Master Plan for the Conservation of Wadi el-Deir (Fig. 13).

This massive tourism development has destroyed the integrity of this historical and biblical landscape. The historical vistas, intact for centuries, are no longer, and the OUVs of the Site have been severely degraded as the "cones of vision" have been dis-



Fig. 11: View of Ar Raha Plain from Monastery, 2010.
Photo: John Grainger



Fig. 12: View of the Monastery and the Ar Raha plain in the distance. Source: www.sinaimonastery.com

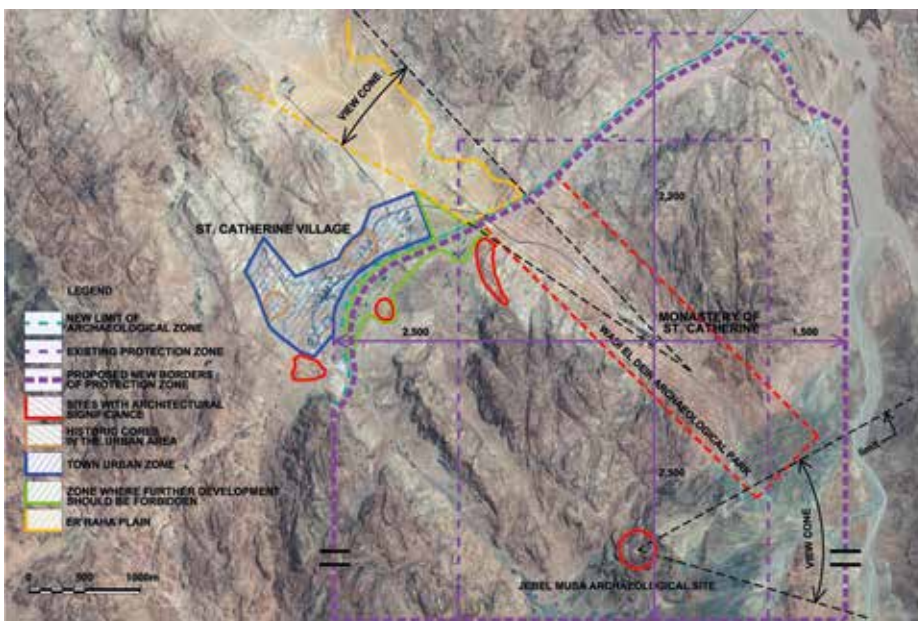


Fig. 13: Source: Master Plan for Wadi El Deir Proposal for the Creation of "Wadi El Deir Archaeological Park", published by The Holy Monastery of Saint Catherine, Mount Sinai, 2010

regarded. Photographs reveal the scale of the development and their alien architecture (Fig.s 14 and 15).



Fig. 14: View from Wadi el Dier of GTP development in Ar Raha, 2023.
Photo: Anonymous



Fig. 15: General view of GTP development on Ar Raha from Safsafa, 2024.
Photo: Anonymous

Yet in its 2023 State of Conservation Report, the State Party perversely maintains that “the visual integrity of the Property, specifically the views from the St Catherine Monastery are assured”. This is clearly not the case as evident in Fig. 16.



Fig. 16: View of Developemnt from Abbas Pasha Barracks archaeological site within Wadi el Dier, 2023.
Photo: Anonymous



Fig. 17: Satellite image of St Catherine, 2005.
Source: Master Plan for Wadi El the Creation of “Wadi El Deir Archaeological Park”, published by The Holy Monastery of Saint Catherine, Mount Sinai, 2010



Fig. 18: Satellite image of St Catherine, 2023.
Source: Master Plan for Wadi El Deir Proposal for the Creation of “Wadi El Deir Archaeological Park”, published by The Holy Monastery of Saint Catherine, Mount Sinai, 2010

The actual situation is clear when Satellite images from 2005 and 2023 are compared in Fig.s 17 and 18 showing the GTP located directly opposite Wadi El Dier and in sight of the Monastery.

Visitor Management Planning

A visitor management plan was a PAMU priority in 1996, as visitor numbers to Saint Katherine had started to increase substantially, and the associated impacts were a burgeoning problem. In 1992 there were about 29,000 visitors/year, rising to 302,000 by 2002, when St Catherine Area was listed as a WH Site, and over 410,000 visitors being recorded 5 years later. Most are day visitors to the Monastery; others climb Mt Sinai to watch sunrise from the summit. A Visitor Management plan was developed as part of the St Katherine Protectorate⁴ General Management and Development Plan in 2003.

The PAMU visitor management plan aimed to mitigate this increasing tourism pressure on the area’s aesthetic, cultural and ecological features, while maximising benefits to conservation

⁴ Note: Interchangeable spelling of St Katherine i.e. Protectorate and St Catherine i.e. Area WHS.



Fig. 19: Visitors descending Mt Sinai in the early morning, 2010. Photo: John Grainger



Fig. 20: The PAMU Visitor Centre at the entrance to Wadi el Deir, 2010. Photo: John Grainger

and the resident Bedouin communities. The major elements of the plan that addressed WH Committee's concerns were: Tourism Management Zoning; Closure of Wadi El Deir to tourism vehicles and opening a new coach and car park outside the wadi's entrance; Constructing a Visitor Centre and tourism facilities at the entrance of Wadi el Deir to take pressure off the Monastery (see Figs 19 – 20); Liaising with Tourism Police and the Monastery to set carrying capacity for tourism sites including Mt Sinai; Introducing entrance fees to sustain the Protectorate's activities; Establishing trails maintenance and refuse collection teams, building compost toilets and rescue and medical facilities on Mt Sinai; Relocating Bedouin cafes and shops from Mt Sinai summit to reduce overcrowding; Diversifying tourism activities with walking guides for different routes; Monitoring activities with the 15 Ranger staff and 20 local Community Guards.

Though developed in coordination with the Governorate of South Sinai, the Tourism Police, the City Council and the Monastery the plan was never officially endorsed, and aside from those aspects managed by the PAMU, it was never implemented. Though the Visitor Centre, car park and toilets were built, the authorities chose not to close Wadi El Deir to tour-



Fig. 21: The PAMU Visitor Centre. It was featured in Phaidon Atlas of 21st Century World Architecture. Photo: John Grainger

ism traffic and divert it to the new car park. The Tourism Police also renegaded on an agreement to limit numbers on Mt Sinai to the site's safe carrying capacity. The Visitor Centre, though functioning, was never formally opened (Fig. 21) and no official local ceremony marked the inscription of St Catherine Area as a WH Site. If implemented the plan could have been effective in controlling and diversifying tourism and mitigating impacts.

Impacts on local Bedouin communities

The WH Site is the traditional homeland of the Jabaliya Bedouin, and it is their cultural traditions that have helped shape and conserved the Site's majestic landscapes. The survival of Bedouin culture in the face of challenge and social exclusion has been a matter of concern for decades. The current development of St Katherine threatens to be the final nail in its coffin. The traditional landscape of their homeland is being ir-retrievably altered.

Anecdotally it is reported that "*homes are being demolished without compensation. Part of their mosque has been demolished. The cemetery has been dug up. The hospital closed. People are deeply depressed at the unasked-for transformation of their quiet mountain village into a shiny resort with no place in it for them*" (see Figs 22 and 23). Local people do



Fig. 22: View across St Katherine town to Wadi Arbaien 2018. Photo: Hilary Gilbert



Fig. 23: Destroyed Bedouin house and shop in St Katherine town 2022. Photo: Anonymous

not find employment in hotels and because of the disturbance from building, no tourists are coming and 49% of local men are self-employed in tourism-related jobs. This loss of income due to the Project has come at the worst possible time with inflation rocketing after devaluation of the Egyptian Pound but further exacerbated by the demands of thousands of migrant workers who are better paid, incentivising shopkeepers to raise prices even more.

Conclusions and recommendations

It is apparent that if the State Party had implemented the requests and recommendations of the WH Committee at the time of inscription the grave situation at St Catherine would likely have been avoided. The physical, aesthetic, and cultural impacts of the GTP on the OUVs of the Site have been immense

and almost certainly caused the irreversible loss of attributes conveying the outstanding universal value of the property.

1. The WH Committee has requested the State Party to submit an updated report on the state of conservation of the property by 1 December 2024 for examination by the World Heritage Committee at its 47th session. In view of the serious situation UNESCO should instead request that the State Party invite a Reactive Monitoring Mission to the Site as soon as possible, with international experts in attendance. The Terms of Reference should include an investigation and recommendation as to whether the site should be added to the Danger List and to consider the demolition option for restoring the Site's OUVs.
2. Listing the St Catherine Area as a World Heritage in Danger would be useful for informing the international community of the situation at St Catherine which threatens its OUVs which are of immense spiritual significance to three world monotheistic religions, and of international renown and may ensure corrective action. Delisting the Site due to the irreversible loss of attributes could be an option but that would remove any influence UNESCO could exert on the State Party of for the rehabilitation of this highly significant Site.
3. The St Catherine Area was inscribed under criteria (i), (iii), (iv) and (vi). This has inevitably led to a misconception that the Monastery is the Heritage rather than the whole Area. Once the rehabilitation of the site has been accomplished, renominate it as an Associative Cultural Landscape would help refocus attention to the wider WH Area and provide for better understanding and protection of the historical landscape and the Monastery's setting.

The World Heritage Sites in Sudan are Under Attack



Awad Abdalla Masaoud, Sudan Cultural Heritage Relief

Sudan has three World Heritage sites approved by UNESCO. The beginning was with Mount Barkal and the sites of the Nubian region, which were listed in 2003, and the mountain includes a number of Nubian archaeological sites. Then the “Archaeological Sites of the Island of Merowe” area was added in 2011, consisting of three separate sites, from north to south: Meroe itself, Musawwarat es-Sufra, and Naqa, and lastly, the Sanjan National Marine Reserve and the Dungenab Island Bay National Marine Park on Mukkawar Island were inscribed in 2016.

On April 15, 2023, a civil war began in Sudan between the Sudanese Armed Forces (SAF) and the Rapid Support Forces (RSF) that rebelled against the government army, as a result of this war many areas of Sudanese cultural heritage included in the UNESCO lists are under threat.

Jebel Barkal and sites of the Nubian Region

On April 15, 2023, the RSF attacked Merowe Military Airport (see Fig. 2), which is 15 kilometers from the sites of Jebel Barkal and is located on the second bank of the Nile River, as a result of which the archaeological site was under severe threat.

In addition, traditional mining poses the most serious threats to the archaeological site, as looters deliberately destroy the environment surrounding the archaeological site in order to make excavations for gold exploration, where mining activity has been monitored for many miners in the vicinity of the archaeological site.

Archaeological sites of the Meroe Island

About nine months after the outbreak of war in Sudan, elements of the Rapid Support Forces have been seen taking the archaeological area of Al-Mosawarat (Musawwarat es-Sufra), which is a component of the “Archaeological Sites of the Island of Merowe” area, as an attack point against the Sudanese Armed Forces. A video was recorded that showed the presence of a number of RSF soldiers in the Al-Mosawarat area between 15–16 January 2024 (Fig. 3). Figures 4 and 5 are from the site, which is located 190 km northeast of the Sudanese capital Khartoum.

All UNESCO heritage sites in Sudan until now are controlled by the Sudanese Armed Forces. The Rapid Support Forces attack the areas around the sites but have not taken any control of

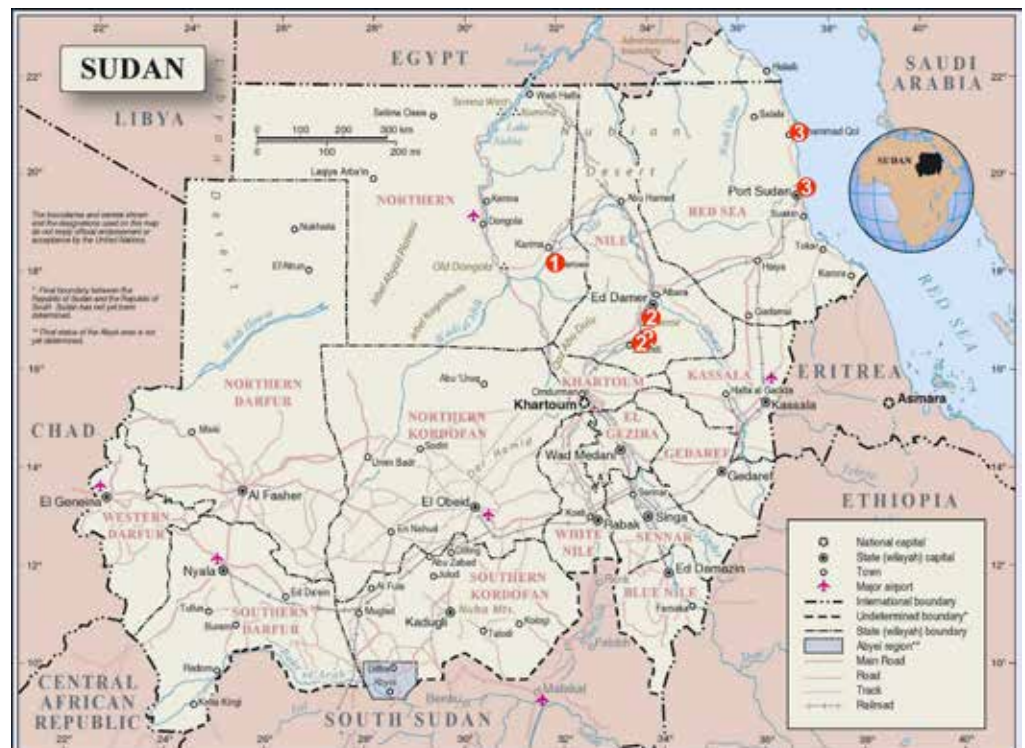


Fig. 1: The World Heritage Sites of Sudan. 1 Mount Barkal and the Sites of the Napatan Region. 2 Archaeological Sites of the Island of Meroe. 3 Sanganeb Marine NP (south) and Dungenab Bay – Mukkawar Island (north). Map: United Nations / Martin Lenk

them. The Sudanese Ministry of Foreign Affairs issued a statement warning against turning the archaeological area into a battlefield, which places the area under severe threat.



Fig. 2: RSF soldiers on the attack of Merowe military airport, April 15, 2023.
Photo provided by the author

Due to military operations and the state of emergency imposed by the government in some areas, including the areas where these sites are located, our teams have not yet been able to be on the ground to assess the damage that may have occurred. As a result, we cannot confirm or deny whether the sites have been damaged, or the extent of damage in current conditions.

We tried to communicate with some government agencies to evaluate the plans and actions that have been taken to protect the sites, but we did not succeed in obtaining any information about the government's plans in this regard.



Fig. 3: Screenshot of a video showing RSF soldiers at Al-Mosawarat.
Photo provided by the author

Recommendations

We recommend the formation of a force of police for the protection of tourism and Sudanese national heritage to carry out intensive deployment around these sites to protect them.



Fig. 4 and 5: Soldiers of the RSF at the Al-Musawwarat es-Sufra site.
Photos provided by the author

Rescue and contingency plans should be developed by the Sudanese Antiquities Authority and the relevant authorities in addition to private institutions working in the field of protection. These plans should include practical steps for protection, such as placing earth mounds, covering statues with sand bags and fireproof fabrics as was implemented at sites during the war on Ukraine.

We strongly recommend the marking of these sites under the protection of the UNESCO Hague Convention of 1954, as well as the strengthening of protection in partnership with organizations such as Blue Shield, and the dissemination of sufficient information on these sites by UNESCO and their distribution to all military actors on the field of war in Sudan.

Cultural Heritage Damaged from Warface in Tigray Regional State, Ethiopia

Isber Sabrine, Heritage for Peace
 Atsbha Gebreegziabher, Tigray Culture and Tourism Bureau

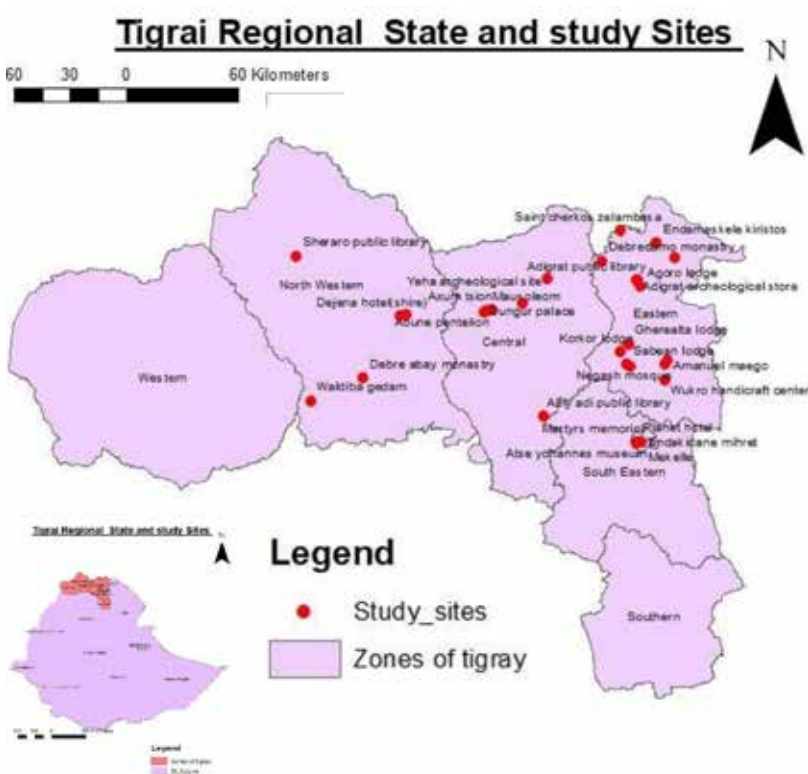


Fig. 1: Tigray Regional State and study sites.

Map: Gidey Desta, 2024

portant to include a photographic documentation. The editor

The recent conflict in Tigray, from November 2020 to November 2022, has resulted in substantial damage to cultural sites, including looting of manuscripts and damage to iconic landmarks. The situation in Tigray is alarming, with reported hostilities and plundering of cultural sites posing a significant threat to the region's rich cultural heritage.

Sites on the World Heritage List

Dungur (Queen Sheba) Palace: It is one of the most attractive and historic heritage sites in Aksum, Tigray. Traditions strongly attribute the palace to the famous legendary Queen of Sheba, who ruled Aksum some 3,000 years ago. Most of the surviving podium walls of the palace were furnished at all corners with large and carefully cut granite corner blocks, which protected, linked, and supported the weaker parts of the walls. The podium was strengthened by a complete row of cut granite blocks.

This paper is an extract from a larger report, covering only those sites which are on the World Heritage List or on Ethiopia's Tentative List for World Heritage nomination.¹ We apologize for the sometimes poor quality of the images. No better photos were available, and in this case we feel that it was im-

¹ The full report can be downloaded from <https://www.heritageforpeace.org/wp-content/uploads/2024/02/Wars-Impact-on-Heritage-a-Preliminary-Assessment-of-Damaged-Cultural-Sites-in-the-Tigray-Regional-State.pdf>.



Fig. 2 Dungur (Queen Sheba) Palace

Photos: Atsbha Gebreegziaber, 2023



Fig. 3–5 Dungur (Queen Sheba) Palace

Photos: Atsbha Gebreegiaber, 2023

Mausoleum in Aksum: This is one of the most important heritage sites in the Aksum World Heritage Site. However, it faced severe damage and sliding due to a lack of attention and preventive measures, vibration caused by shelling in Aksum, mobil-

ity of heavy-load trucks along the obelisk field, and other reasons. Such destruction also directly affects the standing longest and heaviest monuments in the globe, the Aksum Obelisks.



Fig.s 6–7: Mausoleum in Aksum



Photos: Atsbha Gebreegiaber, 2023

Sites on Ethiopia’s Tentative List

Saint Amanuel Maego Church: Located 2 km east of Negash Town on a hill along the Mekelle-Adigrat main road, this sacred place was intentionally damaged with the help of artillery. According to local witnesses, the church was set ablaze after three or four deliberate rounds of artillery firing, with the steeple being the most severely damaged.

Medhane Alem Cathedral Church of Adigrat: Several religious places dedicated to the Catholic Church in Tigray were destroyed during the war in Tigray. For example,



Fig. 8–11: Saint Amanuel Maego Church

Photos: Tigray Culture and Tourism Bureau, 2021

what happened to the Cathedral of Medhane Alem Church, located in Adigrat Town, is a good case in point. Although a reputed worship center, this heritage site was disrespected, de-

stroyed, and looted by Eritrean troops. Windows, doors, documents, and many more properties were obliterated in this heritage site.



Fig.s 12–13: Medhane Alem Cathedral Church of Adigrat



Photo source: Tigray Culture and Tourism Bureau, 2021

Saint Cherkos Church: In Zelambesa, Eritrean troops shelled St. Cherkos Church using artillery (Gnisci, 2021; Plaut, 2021a). Due to its geographical proximity to Eritrea, this church was one of the first worship places to suffer from Eritrean attacks.

The walls, pillars, and iron sheet cover of the church were seriously damaged. Not only was the church shelled and ruined, but also its priceless cultural properties were reported to have been stolen by the armed forces.



Fig.s 14–15: Saint Cherkos Church



Photos: Eritrean Hub, 2022

Abune Abrham Debretsion Rock Hewn Church: Located in the scenic sacred landscape of Gheralta, this rock-hewn church is one of the most magnificent and extraordinary works of art in Tigray. Although it is included in the tentative list of UNESCO, it remained the target of the war. It was bombarded, causing serious vibration, and spilling of the wall paintings, as indicated below. It was also disgraced, as many soldiers had entered inside in search of suspected local leaders without removing their shoes, which is totally prohibited in the dogmas of Orthodox Christianity.



Fig.s 16–19: Abune Abrham Debretsion Rock Hewn Church

Photos: Atsbha Gebreegiaber, 2023



The Cathedral of Axum Tsion is the oldest church in Ethiopia, founded in the 4th Century AD (Henz, 2000; Munro-Hay, 2005; Plant, 1985). As the haven of the Ark of the Covenant (Briggs, 2012; Munro-Hay, 2005), it suffered from the war in Tigray. According to informants, the attempt to loot the Ark of the Covenant proved unsuccessful at the expense of several hundred lives. An article in Apollo – The International Arts Magazine stated that "civilians were killed while preventing the looting of their church" (Gnisci, 2021). A supportive report comes from The Observer, stating "At the Church of Our Lady Mary of Zion in Aksum, fleeing civilians have said the aim of the attack, in which people hiding in the church were brought out and shot, was to remove the ark to Addis Ababa" (Sherwood, 2021:1).



Fig.s 20–21: The Cathedral of Axum Tsion Source: Accessed from the internet

Firedashum Saint Cherkos Church: Located in Gulomekeda Wereda, Eastern Tigray, this was one of the most severely damaged churches in Tigray. It lost numerous priceless church collections, such as manuscripts, crosses, and others due to firing following shelling by Eritrean artillery.



Fig.s 22–23: Firedashum Saint Cherkos Church Photo source: Tigray Culture and Tourism Bureau, 2021

Debre Damo Monastery: Founded by Abune Aregawi in the 6th century, it is considered the "mother of [Ethiopian] monasteries" (Lepage & Mercier, 2005; Phillipson, 2010), having "...a long and checkered history and a strong influence upon the religious literature of the Abyssinian Orthodox Church" (Plant, 1985:190). Panicked, on January 11, 2021, Eritrean troops deliberately shelled the monastery and its environs. The monks' ancient dwellings nearby were destroyed (Plaut, 2021b; Ruiz, 2021). It is mysterious to imagine that armed forces would take advantage of war to destroy such age-old monasteries (Plaut,

2021a; Sherwood, 2021). This monastery was subjected to 118 shells, of which 18 shells were reported to have hit its upper part, killed one monk, and destroyed 6 monastic houses (Shaw, 2021). Published in the Eritrean Hub, an article reveals that "Eritrean troops climbed onto the 6th-century [Debre Damo] monastery and looted old manuscripts and treasures" (Tadros, 2021).



Fig.s 24-25: Debre Damo Monastery: Photo source: Tigray Culture and Tourism Bureau, 2021

Sites possibly on Ethiopia's Tentative List

Abune Penteleon Monastery: Situated in a pre-Aksumite site, the Abune Penteleon Monastery was founded by Aba Penteleon, one of the Nine Saints, in the late 5th century. It blends Pre-Aksumite and Aksumite history. This sacred place was affected by the war in the 1980s and the recent conflict of 2022. It was bombarded during both periods, causing serious vibration, and sliding more than 50 meters down. Currently, it is under restoration with local contributions.



Fig.s 26–27: Abune Penteleon Monastery Photos: Atsbha Gebreegziaber, 2023

Gundagundo Monastery: Founded by the followers of Aba Estifanos (locally called Dekike Estifanos) in the 15th century (Elias, 2008; Nosnitsin, 2000), this monastery is an important religious and cultural center known for its rich manuscript collections, crosses, and crowns (Nosnitsin, 2000). Some months after its restoration by Mekelle University, in collaboration with Tigray Culture and Tourism Bureau and other key stakeholders,

Eritrean troops intentionally targeted Gundagundo Monastery to humiliate the people of Tigray by destroying its sources of pride, courage, and identity. They fired numerous artillery shells to raze the monastery on January 23, 2021, though the attempt ended in vain.

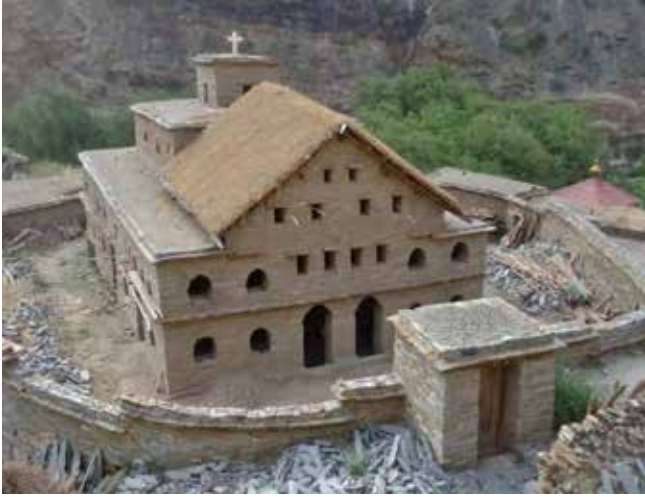


Fig. 28: Gundagundo Monastery Photo: Atsbha Gebreegziaber, 2023

pilgrims. Unfortunately, Eritrean troops destroyed it using artillery, and they plundered its precious heritage resources and vehicles.

Debre Abay Monastery: Another very important religious place founded in the 14th Century (Tigray National Regional State Culture and Tourism Agency, 2010). This monastery contributed significantly to the development of church education and is known for its collection of numerous illustrated manuscripts, gold crosses, thrones, and other priceless heritage resources. This rich monastery faced a deliberate attack (Hiob Ludolf Centre for Ethiopian and Eritrean Studies, 2021). They fired artillery and besieged the town. The monastery was plundered,



Fig. 35: Debre Abay Monastery Photo source: Tigray Culture and Tourism Bureau, 2021

Enda Meskele Kristos Monastery: Another key sacred place established by Aba Zewengel, the Holy Father, at Assimba of Irob Wereda. Located on a scenic plateau, this monastery is among the most visited religious places, attracting numerous



Fig.s 29–34: Enda Meskele Kristos Monastery: Photo source: Mahber Dekike Estifanos, 2021

and most of its movable heritage resources were reported to have been shipped to the Amhara region. However, the number and types of looted properties remain to be investigated.

Waldiba Enda Abune Samuel: Located in Northwest Tigray, this magnificent monastery is known for its rich collection of manuscripts and a religious school. Sadly, this sacred place was targeted during the war, resulting in aggressive looting of numerous movable heritage items and the displacement of monks and nuns. Its recovery remains challenging as the area has not been freed from the invasion yet. A clear picture of the exact number of manuscripts and other portable collections being looted remains to be studied.



Fig. 36: Waldiba Enda Abune Samuel

Photo source: Dimtsi Weyane TV, 2022

The recent war in Tigray caused unimaginable heritage damage and loss in the region, and this is a global loss as well. The above-mentioned cases are simply to provide highlights about what happened to Tigray's heritage due to the recent war. Not only during the war but also the post-war period witnessed further heritage deterioration in the region. The post-Pretoria Peace Agreement of November 2022, which ended the war between Tigray and the Federal Government and its supporters, gives hope to plan for heritage recovery and preservation in Tigray.

References

- Briggs, P. (2012). *Ethiopia: The Bradt Travel Guide (Sixth Edit)*. The Globe Pequot Press Inc.
- Elias, G. (2008). Dekike Estifanos and the Assembly of Debre Birhan.
- Gnisci, J. (2021). Tigray's people and their heritage urgently need protecting. *Apollo - The International Arts Magazine*.
- Henz, P. B. (2000). *Layers of time: A History of Ethiopia*. Hurts.
- Hiob Ludolf Centre for Ethiopian and Eritrean Studies. (2021). An appeal for the salvation of the cultural heritage of Tigray. *Hiob Ludolf Centre for Ethiopian and Eritrean Studies*.
- Lepage, C., & Mercier, J. (2005). *The Ancient Church of Tigray. Editions Recherche sur les Civilizations*.
- Munro-Hay, S. (2005). *The Quest for the Ark of the Covenant: The True History of the Tablets of Moses*. I.B. Tauris & Co Ltd.
- Nosnitsin, D. (2000). New Branches of the Stephanite Monastic Network? Cases of Some Under-Explored Sites in East Tigray.
- Phillipson, D. (2010). *Ancient Church of Ethiopia*. Arada Books Publishing Plc.
- Plant, R. (1985). *Architecture of Tigray Ethiopia*. Ravens Educational & Development Services.
- Plaut, M. (2021a, January). Ethiopia's unique religious heritage suffers tragic damage in the Tigray war.
- Plaut, M. (2021b, January). Monastery 'bombed and looted' in Ethiopian war. *The Times*.
- Ruiz, C. (2021, February). Ethiopian heritage under attack as reports of massacre emerge. *The Art Newspaper*.
- Shaw, A. (2021). The destruction of Tigray's world important cultural heritage. *Eritrean Hub*, 1–45.
- Sherwood, H. (2021, January). Fabled ark could be among ancient treasures in danger in Ethiopia's deadly war. *The Observer*.
- Tadros, M. (2021). Tigray: Why are soldiers attacking religious heritage sites? *Eritrean Hub*.
- Tesfay, A., & Gebreananya, M. (2021, January). Tigray Heritage at risk due to the war on Tigray. *Tghat*.
- Tigray Culture and Tourism Agency. (2014). *Discover Tigray: The Open-Air Museum*.
- Tigray Culture and Tourism Agency.
- Tigray National Regional State Culture and Tourism Agency. (2010). *TOURIST GUIDE TO TIGRAI* (p. 161).

Recent Findings on Forced Evictions Taking Place at Angkor, Cambodia

Amnesty International



On 14 November 2023, Amnesty International published the report *'Nobody wants to leave their home': Mass forced evictions at Cambodia's UNESCO World Heritage site of Angkor* which described the government's "relocation programme" at the World Heritage site of Angkor as forced evictions in disguise, carried out on a massive scale and a gross violation of international human rights law.¹ During the second half of 2022, the Cambodian authorities began evictions that, when completed, will have affected more than 10,000 families – around 40,000 people. The Cambodian government has described the evictions as necessary for conservation and resulting from pressure exerted by UNESCO.² Although the Cambodian authorities characterize the evictions as "voluntary", Amnesty International spoke to more than 100 people, almost all of whom described being evicted or pressured to leave Angkor following intimidation, harassment, threats and acts of violence from Cambodian authorities. According to those interviewed by Amnesty International, at the main resettlement site set up by the government, Run Ta Ek, families received empty plots of land (as well as corrugated metal sheets), forcing many into debt to build their own homes.³

UNESCO asks the Cambodian government to respond to Amnesty International's report

Following the publication of Amnesty International's report in 2023, UNESCO decided to bring forward the date for submission by Cambodia of the State of Conservation of Angkor report (SoC Report) so that it could be examined by the States Parties to the Convention at the 46th session of the World Heritage Committee in 2024.⁴ The UNESCO World Heritage Centre requested the Cambodian government's report "provide a clear understanding of the population relocation programme, and clarifications on the allegations of forced evictions, the processes for identifying legal residents from illegal encroachments as well as the implementation of the Committee's previous decisions."⁵ In February 2024, the UNESCO World Heritage Centre published on its website the SoC Report dated 30 January 2024.

APSARA's State of Conservation Report

Traditional villages: Despite undertaking likely the most significant relocation of people in Cambodia in the last 30 years,

the SoC Report does not provide any verifiable information on how individuals and families that comprise the 112 traditional villages – and those who do not – were selected to be relocated. Instead, the SoC asserts – on what appears to be conjecture – that only illegal inhabitants of Angkor were subject to the relocation program.⁶ The SoC makes repeated assertions in relation to the "illegal squatters" that lack credibility and are easily disputed. For example, it asserts that "legal practice is to apply laws and regulations and EXPEL offenders who, let us remember again, are squatters, have no rights on the land and can claim no compensation."⁷ The SoC summarily condemns the people living at Angkor to being illegal without any legal analysis on the rights of these individuals or any formal legal determination by a court or other equivalent judicial or administrative body. Per international human rights law and standards, the protection from forced evictions is available to all people regardless of whether they own, rent or occupy the land in question.⁸

Further, the state does not provide a list of the 112 villages nor include public land tenure maps nor any official documents to show how it interpreted the laws when undertaking the relocation program. In one instance, it explains that "the Apsara National Authority sent the Royal Government a complete FILE relating to the issue of illegal constructions and its direct and collateral risks."⁹ However, this file is not included in the SoC, nor are its contents mentioned again. If these files exist, they should be made available to the public. This lack of transparency prevents affected individuals from challenging their evictions.

Forced evictions: Regardless of whether the affected people lived in the 112 villages, international law states the protection from forced evictions is available to everyone, whatever the type of tenure or housing or land.¹⁰ The SoC ignores this principle in its entirety. In particular, the SoC Report does not provide a response to – nor even acknowledges – Amnesty International's key findings set out in sections 5.2–5.5 of the November 2023 report. Specifically, it provides no response to Amnesty International's findings that the forced evictions (1) were made amidst threats and intimidation by authorities; (2) did not involve a process of genuine consultation with those being evicted; (3) did not include written notices; and (4) did not involve the provision of adequate compensation for the affected families. There is therefore no recognition by the State that it

has in fact failed to fulfil its obligation to respect, protect and fulfil the right to adequate housing, required under seven major treaties of which Cambodia is a party.

Resettlements sites unfit for purpose: The SoC report states that “Run Ta Ek benefited from comprehensive territorial planning and was provided with definitive equipment” which, amongst others, includes “installation of running water and lighting” and – significantly – “developed living spaces”, which are described as “plots of land [that] vary from 250m² to 600m², according to needs, and that future users are offered 4 models of house to choose from, in accordance with traditional characteristics (house on stilts, sloping roof, daily living space under the building) and including the dwelling itself and the small garden courtyard.”¹¹ However, at the time of Amnesty International’s November 2023 report, and following our latest visit to Angkor in April 2024, none of the individuals and families that Amnesty International spoke to described being offered any sort of housing.

Stigmatizing and derogatory views of people living in poverty that deny them their human rights: The SoC Report also employs a stigmatizing tone and derogatory reference towards what the SoC report calls “illegal squatters”. The SoC describes these individuals as “[s]quatters [that] live off expedients”. According to APSARA, “their misery is obvious”¹² and they are responsible for “the permanent risk of jeopardizing the universal value of the site (VIEW) and threatening the archaeological potential of the lands”.¹³ They “live in deplorable conditions, contrary to all respect for the human person”.¹⁴ These descriptions are dehumanizing of the individuals described. On page 17, images are shown of what APSARA claims is “damage caused by squaterisation”¹⁵ although no evidence is provided to back up this assertion. Notably, the Cambodian government did not include images of the farmers that it forcibly evicted. Nor did it include images of other households that were evicted that resembled modest and well-maintained Cambodian dwellings.

Amnesty International’s updated findings, April 2024

Pause of intimidation and pressure to relocate: In April 2024, Amnesty International delegates traveled to Angkor and interviewed 25 individuals comprised of 12 men and 13 women. Of these, 17 affected individuals were interviewed in their communities at the Angkor site, and eight individuals were interviewed at the resettlement site of Run Ta Ek. Based on the interviews conducted by Amnesty International with the 17 individuals still living at Angkor, it appears that the Cambodian government has stopped pressuring people to leave their homes at Angkor. However, the pausing of intimidatory and coercive tactics to force people from their homes may only be temporary. Eight of the individuals still at Angkor were scheduled to be moved to resettlement sites but had not yet been forced to leave.

Traditional villages: Among those interviewed, 20 people reported having lived on their land at Angkor for several generations. Of those people, 13 people were forced to leave, with one person moved without coercion and the remaining six still living on ancestral land. Where possible, Amnesty International delegates photographed official documents including family books and identification cards issued by the state which listed addresses for persons in their families, which indicated they had lived in villages within Zones 1 and 2 in Angkor prior to 1992. Other affected families were not able to provide documents either because they were destroyed during the Khmer Rouge rule or because APSARA had not provided any documents. The emphasis must be on the Cambodian government to clearly demarcate who is allowed to stay at the Angkor site.

State of Run Ta Ek: Several families still do not have access to piped water despite living at the site for months or years. Many areas of the resettlement site continue to have only dirt roads without drainage that are prone to flooding in the wet season. Houses are often inadequately built and are extremely warm during the hot season and expose the inhabitants to the elements in an unsafe manner. Houses are routinely destroyed or damaged during storms, something even local officials have admitted.¹⁶

Many families also reaffirmed Amnesty International’s previous findings that the site did not allow for employment or economic opportunities and that many families had to leave during the day to return to Angkor and Siem Reap. As a result, several families described using their ID Poor cards, a government subsidy program that was offered as a part of the resettlement package, as collateral to secure private loans, often to build their houses, meaning they were indebted, without work and unable to access the social security benefits that were provided as part of the relocation program.

Conclusion

In November 2023, UNESCO reiterated its commitment to the full respect of human rights and urged Cambodia to “ensure that all necessary corrective measures are put in place urgently to ensure full respect of all Human Rights for those communities concerned.”⁷ The SoC from the Cambodian government does not indicate any corrective measures are in place, relies on conjecture and fails to address the human rights violations that Amnesty International has documented. Unless a strong, unequivocal rebuttal is made that conservation is not a justification for human rights violations, then conservation efforts will increasingly be weaponized by states for their own ends, often at the expense of human rights. Amnesty International urges the World Heritage Committee and UNESCO to adopt a strong decision on Angkor in favor of the protection of human rights and to condemn the forced evictions which the Cambodian government is carrying out in the name of conservation.

Notes

- 1 Amnesty International, Cambodia: 'Nobody wants to leave their home': mass forced evictions at Cambodia's UNESCO world heritage site of Angkor (Index: ASA 23/7374/2023), 14 November 2023, <https://www.amnesty.org/en/documents/asa23/7374/2023/en/>
- 2 Press OCM, Prime Minister Hun speech at a graduation ceremony at a private university in Phnom Penh, 3 October 2022, <https://www.youtube.com/watch?v=JaFkMxtVd5M> [unofficial translation].
- 3 Amnesty International, Cambodia: 'Nobody wants to leave their home': mass forced evictions at Cambodia's UNESCO world heritage site of Angkor (as previously cited).
- 4 World Heritage Centre of the United Nations Educational, Scientific and Cultural Organization (UNESCO), "UNESCO's reaction to Amnesty International's report on Angkor", 15 November 2023, <https://whc.unesco.org/en/news/2629>
- 5 World Heritage Centre, Letter to the Permanent Delegate of the Kingdom of Cambodia to UNESCO, Ref: CLT/WHC/APA/HG/NH/DB/23/111, 13 November 2023.
- 6 APSARA National Authority, 2023 Report on the State of Conservation of Angkor, January 2024, <https://whc.unesco.org/en/soc/4521>, p 23.
- 7 APSARA National Authority, 2023 Report on the State of Conservation of Angkor, January 2024, <https://whc.unesco.org/en/soc/4521>, p 21.
- 8 Basic Principles and Guidelines on Development-Based Evictions and Displacement, Annex 1 of the report of the Special Rapporteur on adequate housing as a component of the right to an adequate standard of living A/HRC/4/18 (2007), para. 6.
- 9 APSARA National Authority, 2023 Report on the State of Conservation of Angkor (as previously cited), p 21.
- 10 Basic Principles and Guidelines on Development-Based Evictions and Displacement, (as previously cited), para. 6.
- 11 APSARA National Authority, 2023 Report on the State of Conservation of Angkor (as previously cited), p 25.
- 12 APSARA National Authority, 2023 Report on the State of Conservation of Angkor (as previously cited), p 44.
- 13 APSARA National Authority, 2023 Report on the State of Conservation of Angkor (as previously cited), p 20.
- 14 APSARA National Authority, 2023 Report on the State of Conservation of Angkor (as previously cited), p 20.
- 15 APSARA National Authority, 2023 Report on the State of Conservation of Angkor (as previously cited), p 17.
- 16 CambolA, Heavy Rains Destroy Homes of Relocated Run Ta Ek Residents, Khuon Narim, Ly Rosslan, 7 May 2024, <https://cambojanews.com/heavy-rains-destroy-homes-of-relocated-run-ta-ek-residents/>

Annex: People of Angkor

A Photo Documentation by Choulay Mech, 2021–2023

Grandpa Em Yean, 77 years old, Former APSARA Conservator at Angkor Park, Evicted to Run Ta Ek



In 2021,
before eviction



In 2023,
in Run Ta Ek

Grandpa Em Yean was made to move because APSARA said he used groundwater for his rice fields.

However, he said he uses rainwater to water his fields instead. Em Yean also lives in the forest near Angkor Wat and has no access to groundwater or surface water from the area without permission from APSARA. He is the husband of grandma Yot Oeum.

Grandma Yot Oeum who used to live in Angkor Park. Photo 2021



Grandma Yot Oeum after she relocated to Run Ta Ek. Photo 2023



Grandma Yot Oeum was living at Trapeang Ses village in Angkor Park. Grandma has to do a lot of work even though she is also old. She has to take care of two grandchildren and her husband because her daughter and her son works at another province and are seldom at home.

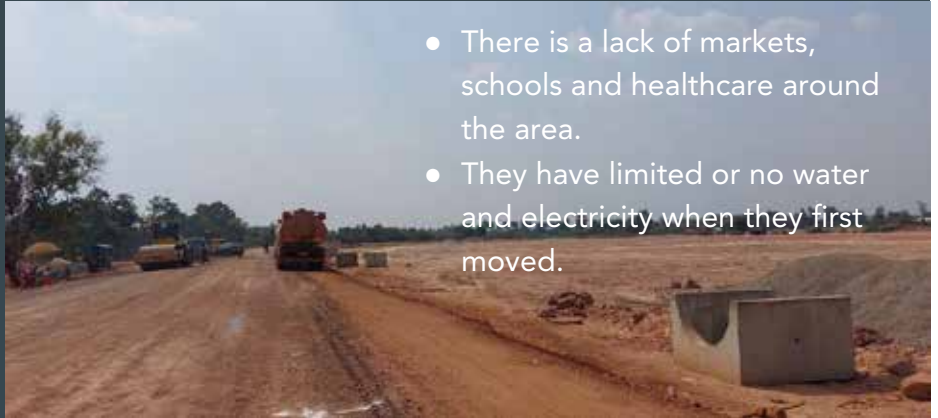
Grandma was very well-known in her village because she is knowledgeable and can do many things in the community.

Destroyed homes at Angkor Park, leaving spiritual objects, memories, and even animals/pets behind





Basic infrastructure is still under construction and not provided prior to relocation. This new environment is covered with mountains of sand from the ongoing construction, making it really difficult for some people to breathe.



- There is a lack of markets, schools and healthcare around the area.
- They have limited or no water and electricity when they first moved.



Grandma is 68 year old and has been blind on both eyes since she was around 10 years old. It is so difficult for her to move to Run Ta Ek because she is not used to the new environment. She is really afraid of the storm and rain when it comes.





II. Historic Cities and Urban Ensembles

St. Petersburg: Destruction of Monuments at the Okhta Cape has Begun

Anonymous authors¹

About the archaeological monuments of the Okhta Cape – a neolithic site, an early medieval fortification, three late medieval fortresses, miraculously preserved at the confluence of the Neva and Okhta rivers – and the fact that the company “Gazprom-Neft”, with the assistance of the city authorities and the Ministry of Culture of the Russian Federation, want to demolish them to build an office center, see the previous World Heritage Watch Reports².

In April 2024, the destruction of the archaeological monuments of the Okhta Cape began. Construction equipment has appeared there in large numbers, excavators are digging, the piles are being driven in, and equipment is being brought in. The sites recognized by Gazprom and the Ministry of Culture as OKN (object of cultural heritage) (10–15% of the cape's territory) are fenced with red netting. These events caused a new wave of appeals of the heritage preservation groups to Vladimir Putin. They recalled that the St. Petersburg authorities, Gazprom and the Ministry of Culture sabotaged the President's instruction given in 2021 to consider the creation of an archaeological museum-reserve, and proposed to nationalize the Okhta Cape. The heritage preservation group again informed the head of the Investigative Committee of the Russian Federation, Alexander Bastykin, about the fact that the legislation of the Russian Federation on objects of cultural heritage is being violated right now. Earlier this Committee conducted an inspection and refused to initiate criminal proceedings. Now an additional check is being conducted.

15 years ago, citizens protested against plans to build a skyscraper on the Okhta Cape by going out to mass meetings and demonstrations, which eventually led to the rejection of the idea. Now mass actions are impossible: Governor Alexander Beglov has once again, under the pretext of “corona virus



Fig. 1: Works on the Okhta Cape on May 2, 2024. In the left background the Lakhta Center can be seen, which Gazprom initially wanted to build on the Okhta Cape.
Photo: “Save Okhta Cape” group <https://www.facebook.com/photo?fbid=822082663278119&set=pcb.822082873278098>



Fig. 2: Works on the Okhta Cape on 25 April 2024.
Photo: “Save Okhta Cape” group https://vk.com/albums-200931602?z=photo-200931602_457247655%2Fphotos-200931602

restrictions”, extended the ban on mass events until the end of 2024. This means that any street manifestations of disagreement with the decisions of the city and federal authorities, even single pickets, are prohibited. Responsibility for violation – up to criminal, while “neutral” or organized by the authorities mass actions are held without hindrance.

For several years now, every Saturday at 1 p.m., a civil society group of the “Okhta Cape Defenders” has gathered at Okhta Cape, discussing news and plans, followed by plainclothes men.

¹ The identity of the authors is known to World Heritage Watch.

² Andreeva, Victoria, Ryzhov, Mikhail, Okhta Cape Archaeological Monuments in St. Petersburg: Is the End Near? // World Heritage Watch Report 2023. Berlin World Heritage Watch 2023, pp.83-86; Minchenok, Elena, Ryzhov, Mikhail: The Tug-of-War for St. Petersburg's Okhta Cape Continues // World Heritage Watch Report 2022. Berlin: World Heritage Watch 2022, pp. 163-166; Minchenok, Elena: Okhta Cape: Archeological Site Extending from the Stone Age to the XVIII Century in Urgent Need of Support and Recognition // World Heritage Watch Report 2021. Berlin: World Heritage Watch 2021, pp. 49-53, etc.



Fig. 3: Heritage preservation group near the monument on the Okhta Cape, January 21, 2023.

Photo: "Save Okhta Cape" group <https://mr-7.ru/articles/2023/01/23/zashchitniki-okhtinskogo-mysa-obratilis-k-bastrykinu-i-agapitovoi-news>

“To make Gazprom feel good.”

Despite record losses in 2023, Gazprom is not giving up on its plans. The Lakhta Center tower built back in 2018 is not yet in operation, but Gazprom still intends to build a business district and two more skyscrapers next to it.

St. Petersburg Governor Alexander Beglov states: “If Gazprom is manna from heaven for some, but a big expense for the city.”³ Bridges and highways are now being built to connect the Lakhta Center with the city, and this is being done at the expense of St. Petersburg's budget. “In general, for today and future years, the city will spend about 200 billion rubles on the development of this infrastructure, and to make it good for Gazprom,”⁴ is another statement of the governor. At the end of 2023, the next general plan of St. Petersburg was approved, according to which the entire Okhta Cape is assigned to the zone of business development “D” (business). Proposals of citizens to change the zone to “R” (recreational) remained unheeded.

“Memory of place” instead of monuments

In 2023, the exhibition “Archaeology of St. Petersburg. The Beginning”, and preparations for the creation of a permanent Museum of Archaeology began. It was decided locate it in the Menshikov Bastion of the Peter and Paul Fortress (it is part of the Museum of the History of St. Petersburg). A few years ago, a fragment of a wood-and-earth rampart was discovered inside the bastion – a part of the very first fortress founded by Peter the Great in 1703. A few years later, the fortress was rebuilt in stone, and the original ramparts were buried under a layer of



Fig. 4 and 5: Renderings of the Museum of Archaeology in the Peter and Paul Fortress. February 15, 2024. Image: Fontanka <https://www.fontanka.ru/2024/02/15/73232426/>

mounded soil. The concept of the future museum proposes to make a “model” of a part of the wood-and-earth fortress (i.e. to demolish and recreate a part of it), and to make an exposition with archaeological finds, including those from the Okhta Cape, in the remaining parts of the bastion.



Fig. 6: The Menshikov Bastion of the Peter and Paul Fortress under construction for the Museum of the History of St. Petersburg, February 25, 2024. Photo: Authors

On the Okhta Cape, Gazprom Neft promises to “preserve the memory of the place,” which, as lawyers point out, is a substitution of concepts: according to Russian law, an immovable object of cultural heritage must be preserved in its entirety in situ. Citizens wrote letters to Gazprom-Neft's management with questions about how they intend to preserve these objects, and received the answers: “all information is posted on public resources and is available to interested parties”. The only such “resource” is the website of the City Committee for the State Inspection and Protection of Historic and Cultural Monuments (KGIOP), where the “Documentation justifying measures to en-

3 Beglov about Gazprom: manna from heaven for some, but a big expense for the city, September 29, 2023 // Fontanka. URL: https://www.fontanka.ru/2023/09/29/72758642/?fbclid=IwAR3SQp3C6nxzMHGY_06mJsqpO-ERkePM0mBG4RffrZR9Ka042wE4MQjoVN5k

4 “To make Gazprom feel good”. St. Petersburg will fulfill its road construction obligations despite the reduction of revenues from the largest taxpayer, January 30, 2024 // Fontanka. URL: <https://www.fontanka.ru/2024/01/30/73175684/>

sure the preservation of the OKN of federal significance “Nien-shants. Swedish fortress of 1611-1703, sections of the cultural layer of Neolithic and early metal V-II thousand BC and ground burial ground of 16-17 centuries.””

However, information about specific sites, including those that the authorities and the developer recognize as objects of cultural heritage, is covered with black squares. For example, even the “Historical route on the territory of the capital construction object” is hidden. The KGIOP announced this as “public discussion of the act of cultural and historical expertise of the project of improving the territory of the future multifunctional building”.

The result of all these plans is obvious: the authentic part of the very first constructions of St. Petersburg and the monuments of the Okhta cape will be destroyed, instead of them only a room of 15 thousand square meters will remain – 10-15 percent of the entire archaeological complex as an “underground museum” inside the business center.

The formal developer of the Okhta Cape is now OOO CISK, its founder is a certain company “AO Leader”, which was registered in 2022, and it has only one shareholder a.k.a. a director – a private person. CISK and “Gazprom Neft. East-European

Projects” have a common CEO – Elena Ilyukhina. The author of the architectural concept of the business center – the Japanese bureau Nikken Sekkei – does not appear in the project documentation, the customer and developer of architectural solutions are listed as Russian “LLC Metropolis” and “LLC TPO Pride”.

Perhaps this is a way to circumvent sanctions, but all this may also serve as a sign that in case of insurmountable problems (due to sanctions, lack of money or other) Gazprom will try to get rid of this territory. And since no one will buy it with the monuments, they will have to be destroyed.

Who determines value?

The historical center of the city is also under threat. In 2009, St. Petersburg adopted Law No. 820-7, which prohibited the demolition of any buildings built before 1917 in the city center, and outside of it – houses built before 1957 and wooden one- and two-story houses. This made it possible to stop the wave of demolitions to which the historic center was subjected during these years. However, developers began to find ways to circumvent the law. The most popular way was to falsify documents – to change the year of construction.

At the end of 2023, KGIOP proposed amendments to the law, which divided all buildings into “valuable for the environment”, “environmentally consistent” – the demolition of which is still prohibited, and environmentally inconsistent, which included about 300 buildings⁵ that can be demolished and rebuilt. This list includes, for example, buildings built after 1917 in the style of constructivism or Stalinist neoclassicism, not recognized as cultural heritage objects and thus not protected by regional or federal law, but at the same time perfectly fit into the urban environment. The list of “non-monuments” includes many service buildings and yard outhouses, but they are part of the historical environment of St. Petersburg. The law does not say who exactly and by what criteria determines whether houses belong to “environmentally consistent groups”.

St. Petersburg is a multi-component UNESCO World Heritage Site, its historical environment (i.e. buildings built before 1917) is under comprehensive protection. Therefore, cultural heritage preservation groups believe that the revision of the unconditional value of the historical environment with the replacement of the objective chronological criterion with the subjective criterion of “value” may lead to densification and fundamental changes in the appearance of intra-quarter buildings in the center of St. Petersburg.

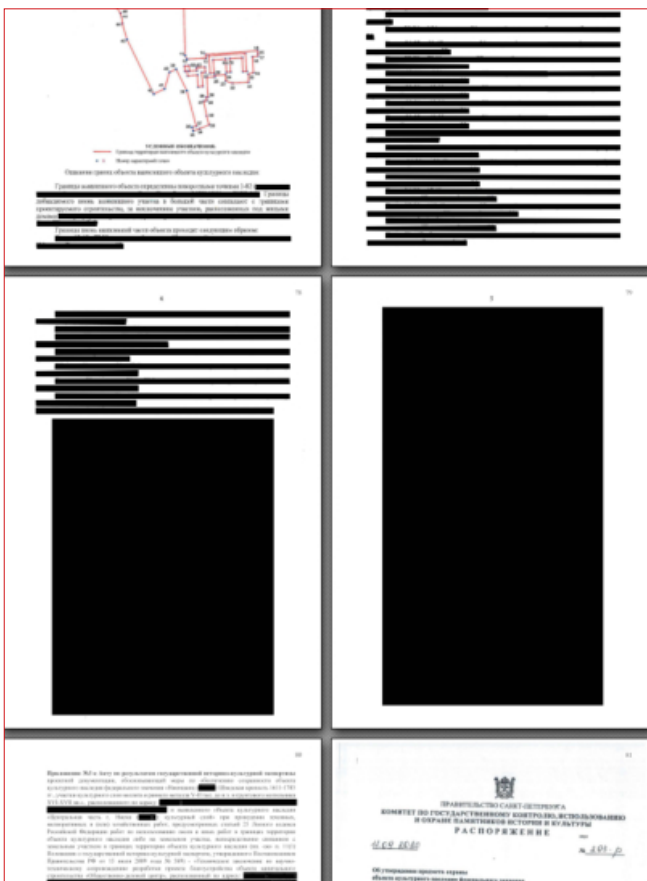


Fig. 7: Blackened parts of the “Act of State Historical and Cultural Expertise for publication”, January 22, 2024. Source: KGIOP website https://kgiop.gov.spb.ru/media/uploads/userfiles/2024/01/22/Акт_ГИЭ_Охтинский_мыс_для_публикации.pdf

5 Can be demolished. “Fontanka” shows what “environmentally inconsistent” buildings in St. Petersburg are designed to be withdrawn from preservation [with a list of objects], April 3, 2024. URL: <https://www.fontanka.ru/2024/04/03/73418534/>

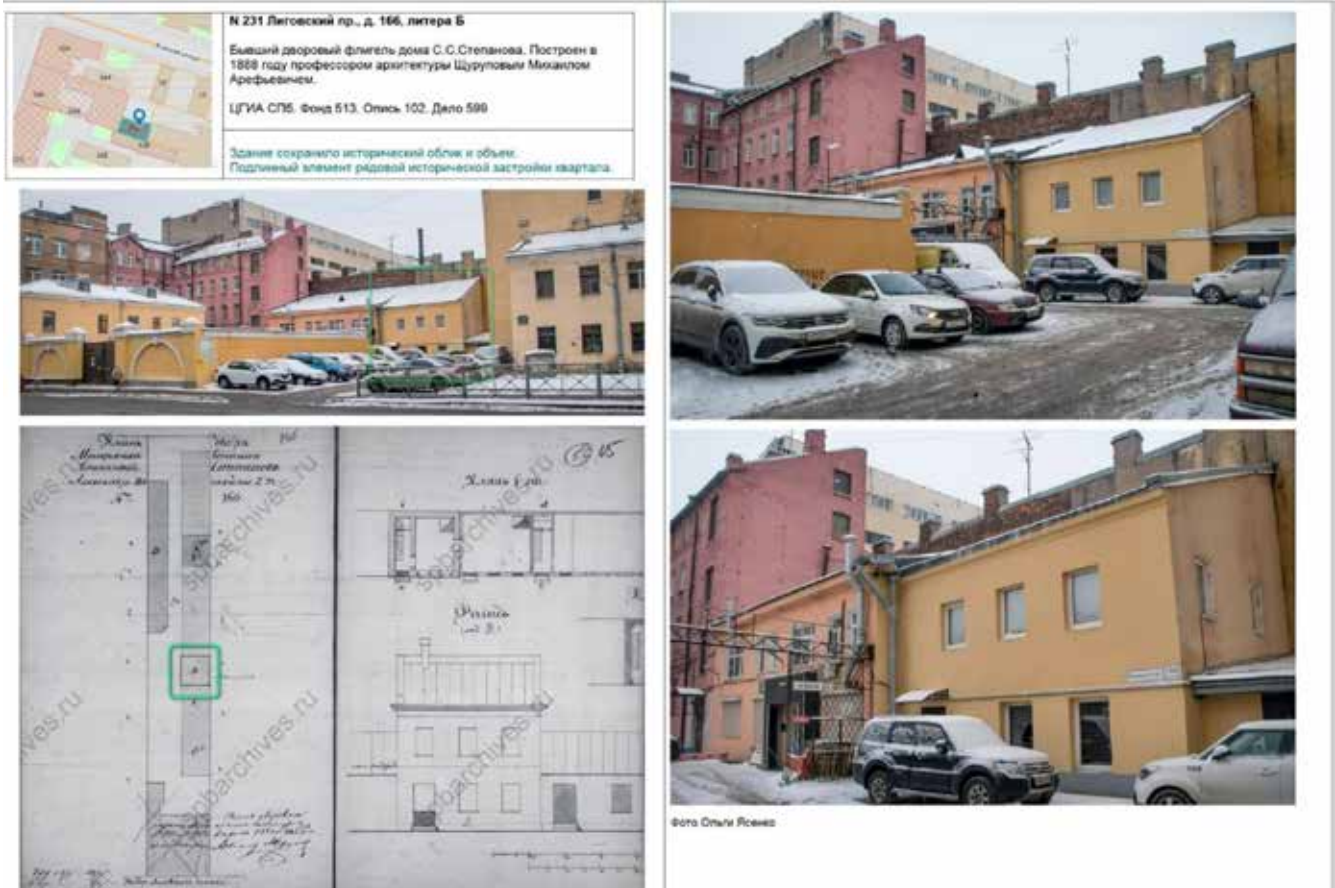


Fig. 8: Ligovsky pr. 166-B – one of the buildings considered to be an environmentally inconsistent object, April 6, 2024.

Photos: Olga Yassenko, heritage preservation movement “Zhivoy Gorod” (Living City). ZGIA SPb / Zhivoy Gorod Chat in Telegram. https://t.me/save_spb_chat/7219

To dig or not to dig?

In February 2024, the Russian Government approved new, still temporary, rules for archaeological surveys and historical and cultural expertise. Now, if the works are not deeper than half a meter or if the depth of works does not exceed the capacity of “technogenic soils”, or “within the existing foundations of

buildings, structures and constructions”, archaeological surveys are not necessary, and the decision on the need for expertise is made by the owners of land plots and developers. It is well known to specialists that many archaeological monuments are found at a depth of less than half a meter from the ground surface.



Fig. 9: Excavations opposite the Okhta Cape, July 31, 2023. Residential houses for the Supreme Court judges are planned to be built here. It can be seen that the 19th century cobblestone pavement is at a depth of about half a meter.

Photo: Vk group “Bolshaya Okhta for citizens” / Sankt-Peterburg Bezformata <https://sanktpeterburg.bezformata.com/listnews/arheologi-otkopali-bulizhnie-mostovie/119681223/>

In St. Petersburg, archaeological surveys have long been regulated by regional norms, which specify where they are obliged to be carried out. And right now lawyers, archaeologists and developers are trying to figure out which law should be implemented – city or federal. The authors of the amendments justify the changes as follows: “This will give in the current difficult economic conditions of economic sanctions against the Russian Federation additional opportunities to optimize the costs of investment activities...”

Conclusions

The monuments of the Okhta Cape are being destroyed right now before our eyes, and civil society has almost no means to stop it. And against this background, the authorities, together with business, are coming up with new forms of “legal” reduction in the number of protected objects and building new objects invading the city’s panoramas. St. Petersburg is ripe for an honorary degree “heritage in danger”.

Monument Protection Obstructs Climate Protection at the Waldsiedlung Berlin-Zehlendorf

Ute Scheub, Parrot Estate Association



Fig. 1-3: Buildings in the Waldsiedlung Zehlendorf.

Photos: Richard Röhrbein

The Waldsiedlung Zehlendorf (Forest Estate Zehlendorf) in Berlin, also known as the "Parrot Estate" because of its bright colours, is famous for its eco-social character. It was built between 1926 and 1932 by the architects Bruno Taut, Hugo Häring and Otto Salvisberg and was the seventh "Berlin Modernist" estate to be nominated for Germany's Tentative List for UNESCO World Heritage. "Architecture is the art of proportion", Bruno Taut believed and designed the distances between houses and gardens in such a way that people could and had to meet. A feeling of neighbourly closeness was literally created in passing and has persisted for many decades to this day. The residents love the wonderful colours and shapes of the terraced houses and apartment blocks with their gardens, terraces, loggias, three-coloured window frames and doors. One would therefore assume that the residents would support the re-nomination of the estate. This would certainly have been the case if the conservation authorities had not acted so counterproductively.

The "Verein Papageiensiedlung" („Parrot Estate Association") was founded in 2010 to reconcile monument protection and climate protection. As the 100th anniversary of the estate approached, its members wondered what Bruno Taut himself would have done to preserve his ensemble for the next 100 years. The answer was: Taut, a nature lover, would certainly have favoured renewable energies and ensured climate protection and sustainability!

Committed residents gathered ideas for this in future workshops and working groups: The flat roofs are ideal for installing solar thermal and photovoltaic systems. Mobility should be made more climate-friendly by switching to car sharing, electric cars and bicycles. Gardens can be cultivated more ecologically and their biodiversity protected. Rainwater could be collected and channeled to street trees. Stoves could use new filters to trap particulate matter. A nearby organic farm could contribute to an almost CO₂-neutral diet by supplying vegetables. Some of this has already been realised since 2021.

The committed citizens eventually expanded the plans into a "neighbourhood concept" for a "climate-friendly neighbourhood" („klimafreundliches Quartier, or kliQ for short). The kliQ climate project includes other parts of the neighbourhood in addition to the Parrot Estate. With the support of the Steglitz-Zehlendorf district authority, the association commissioned the "Berliner Energie-Agentur" to analyse the potential for climate protection here. The results were presented at a kliQ workshop in February 2023 and published on the website <https://kliq-berlin.de>.

So much voluntary citizen involvement takes a lot of work off the authorities' hands. One might have thought that this would be honoured as part of the UNESCO nomination process and the public participation required as part of it. But unfortunately, the state monument authority and the agency it commissioned,

"Pro Denkmal", were not interested at any time. They had their own ideas of what the citizen's participation required by UNESCO should look like.

From 2021 to 2023, they organized a total of five events, which they called "citizens' workshops", but which neither involved all citizens of the estate nor had the character of a workshop. In a workshop, people consult, tinker and fine-tune together. Here, however, the results desired by the authorities were more or less already finalized. The conservationists specified in detail what the "energy upgrade" of the estate should look like. Renewable energies were to be permitted, but only under restrictive conditions. Photovoltaic and solar thermal systems on the flat roofs would only be allowed to reach a certain height, which would only permit limited use due to their shallow installation angle. Air heat pumps for heat generation are only authorized in a few cases. Thermal insulation plaster on the exterior façades was largely prohibited by the authority because this would lead to a "loss of the appearance of the façades as a listed building". Only internal insulation was permitted - but this favours the formation of mould in these old buildings. In addition, the residents would probably have to move out for several months during the construction work on the walls and basement ceilings – an unrealistic idea.

There were also extremely detailed regulations for front and back gardens. For example: private hedges 50 centimeters high in the southern part of the estate. Or: only two bicycle racks of a certain shape and colour in the front garden. The conservationists did not realise that bicycle traffic urgently needed to be promoted because parked cars and SUVs in particular were blocking the view of the facades. They were not interested in the concept of the kliQ project for more climate-friendly mobility. "That's not within our remit," they said.



Fig. 4: Frozen rainwater spilled on the sidewalk from the gutters is a serious accident risk.
Photo: Ute Scheub

Their plan also did not take into account the fact that, according to the Senate's declaration of intent, Berlin is to be transformed into a "sponge city" in response to climate change. Wherever possible, precipitation should no longer run off uselessly into the sewerage system, but be stored on site so that it can water plants and cool in times of drought. Water-permeable pavements, wild herb gardens, green façades and rainwater troughs for street trees are suitable for this purpose. Nothing of the sort can be found in the plan.

Instead, one of Bruno Taut's few building mistakes is to be preserved: Gutters that channel rainwater from the roof over front gardens and pavements into the street and the sewage system. In winter, dangerous black ice forms on the pavements, which has already caused many people to fall. And in summer, water is diverted away, which the street trees there urgently need.

There was therefore a lot of resentment in the "citizens' workshops", with numerous residents voicing massive criticism. As there are probably more architects and construction experts living in the architecturally beautiful estate than anywhere else in Berlin, the objections were correspondingly expert. The main objections were that the plans were unrealistic and unsuitable for everyday use, that they would prevent climate protection and jeopardise the planned development of a climate-friendly neighbourhood. The "Berliner Energie-Agentur", which had prepared an analysis of the potential for climate measures in the neighbourhood on behalf of the „Parrot Estate Association“, also saw its work ignored. It tried to achieve changes in meetings with the conservationists. In vain.

The criticism was repeated when the State Monuments Office published a draft of a new "monument maintenance plan" for the estate in May 2023 and invited written objections - but only from a minority, namely the owners of the 800 or so terraced houses. The tenants of the 1,100 multi-storey flats were not included in the entire process, nor were the condominium owners' associations in the apartment blocks. A total of 650 objections were received. As there are only 800 homeowner households, this was an unexpectedly large and difficult amount for the authority to handle.

The residents' comments and criticisms were then summarized in a "synopsis" on the authority's website. As far as can be seen, the authority only formally and explicitly accepted only one single objection. Some errors and instructions were tacitly corrected. The vast majority of the other objections were ignored or given answers that did not match the questions. This caused frustration and anger among those who had formulated the submissions. They asked themselves: Is this supposed to be citizen participation? What's the point of the whole elaborate and expensive process if they don't want to hear our criticism?

There was another oddity. On its website, the State Monuments Office used misrepresentations and misleading wording to give

the impression that it had co-initiated or at least supported the kliQ climate project. World Heritage Watch also criticized in a press release at the time that the authorities were probably trying to "scam" a subsequent nomination. The German government was called upon to "move away from dogmatic positions on monument protection and endeavour to balance the interests of climate protection and monument protection. The Paris Climate Agreement is just as binding for Germany as the World Heritage Convention; it is not justifiable to prioritize one agreement over the other. At the same time, the German authorities must finally show a serious endeavour to regard civil society as a partner on an equal footing."

Nevertheless, in December 2023, the Conference of Culture Ministers, which is jointly responsible for World Heritage procedures, decided to place the Forest Estate Zehlendorf on the Federal Government's Tentative List. The fulfilment of the necessary UNESCO criteria of "citizen's participation" and "sustainability" is said to be met. Now the Federal Foreign Office still has to decide whether it agrees and authorises the subsequent nomination.

Preliminary conclusion: the monument authority has ultimately not done itself any favour with its strange interpretation of citizen's participation. Its reputation in the neighbourhood has plummeted. "If I want to change something, I no longer submit an application to the authority", was the reaction of many



Fig. 5: Endless rows of cars and rubbish bins which remain unemptied on the sidewalks for many days mar the visual integrity of the estate more than some other matters regulated in embarrassing detail.

Photo: Ute Scheub

neighbours. Whether it's thermal insulation plaster, solar panels or heat pumps – many now do what they like and no longer ask whether they are allowed to. For the authorities, this is the opposite of what was intended. Others try to comply with the regulations of the monument maintenance plan - and then realize with astonishment that these have been changed, at least in the case of external insulation. So now a certain layer of insulation is permitted after all. The change was made secretly after the fact.

Before this all began in 2021, probably a majority of residents was in favour of the World Heritage status. However, the authorities rejected a representative survey in the estate proposed by the Parrot Estate Association at the beginning. In the meantime, a large majority is likely to be against it; at any rate, many residents can be heard talking angrily about it. The whole thing has not done the social peace in the estate any good either: a tiny group of residents feel called upon to ask neighbours to make their front gardens "monument-appropriate".

One can only speculate as to why the conservationists organized the process so amateurishly. Ignorance? Clumsiness? An insistence that the authorities always know best? Fear of ceding authority? The authorities obviously had no experience of citizen participation. However, it also did not familiarize itself beforehand with how this could be optimally carried out, did not undertake any research on site beforehand and did not involve the association, the kliQ project with its many volunteers or other groups in the planning. Ignoring empirical knowledge and voluntary community work is a mistake that will eventually backfire.

The prescribed "monument maintenance plan" also lacks a clear line. The estate's biggest problems have been ignored, but a great deal of regulatory fervour can be seen for the smallest things. The beautiful facades of the estate are truly not obscured by too high hedges or too many bicycle stands, but by the endless rows of parked cars and many different types of rubbish bins. Although the Association Parrot Estate submitted a finished plan for underground rubbish storage facilities, the State Monuments Office refused to support it. It saw itself as not being responsible.

Is the monument authority concerned with enforcement for the sake of enforcement? Is the whole thing now perhaps also a covert power struggle? That's the impression you get when you look at the most recent of their many strange decisions. In March 2024, a group of volunteers planned to move their community garden to a narrow strip of green in a listed area. They wanted to erect a few raised beds. The State Monuments Office didn't approve this because it was located in the "core zone" of the World Heritage Site. Bruno Taut had explicitly made the cultivation of green spaces possible with the creation of gardens and farm tracks. So why are raised beds a nuisance? And long rows of SUVs and rubbish bins aren't?

Goslar – A World Heritage Site Between Self-abandonment and Decay

Henning Frase

The inconsequential experience of the 2017 flood, the observation of the ongoing decay of vacant important architectural monuments, obvious structural and civil engineering failures and inadequate documentation of the existence and condition of the old town of Goslar as an important part of the World Heritage property are the hallmarks of the futile efforts to save the old town of Goslar that have been evident for many years.

Structural deficiencies at the various administrative levels, such as the permanent understaffing of the Lower Monument Protection Authority, city-wide urban development problems such as the lack of flood protection, and problems observed in the preservation of existing buildings in both the public and private sectors have reached a dimension that in some cases threatens the substance.

A lack of discourse between the public and political decision-makers, and a lack of appreciation of their own building fabric have led to a negative connotation of the word "heritage protection", which many building owners perceive as nothing more than a burden. It is clearly evident that the town of Goslar is no longer able or willing to preserve its historic old town on its own. This also includes the expected future demolition of many dilapidated buildings in the World Heritage area.

The defensive attitude of many of those responsible is clearly recognizable, reacting to criticism from the public with discrediting and defamation while not reflecting on the obvious problems themselves. The public discourse on the referendum on the citizens' petition in April 2024 has illustrated this development with almost daily euphemistic reporting initiated by the investor and the city of Goslar. After the successful vote in favour of the city of Goslar, the opinion of the city planner involved from Braunschweig, "who had recently made no secret of his scepticism towards grassroots democracy", published in the *Goslarsche Zeitung*, was particularly irritating.

In other cities, such as Potsdam or Quedlinburg, restoration measures following decades of decay have led to a technically outstanding restoration of the extensive monument substance in the course of just 15 - 20 years, and have subsequently contributed to a considerable economic upturn.

The topics listed below are intended to serve as a stimulus for the necessary discussion process.

Flood protection

The still missing flood protection for the drainage of the rivers Gose and Abzucht from a catchment area of approx. 40 km² in front of the town is still not recognizable. All the technical aids acquired to date can only contain potentially large volumes of water to a limited extent, and can only reduce, but not prevent, major damage to important parts of the old town.¹

Vacant buildings in the market square area

Around the market square and the market church, iconic buildings such as the Hotel Kaiserworth and the three adjoining buildings in Worthstrasse are vacant. The two buildings of the former Ratsapotheke pharmacy at Markt 2 is also vacant, as are the buildings of the Hotel Brusttuch and Hoher Weg 1, 2 and 3. The radiant natural stone paving in front of the town hall has been missing on an area of around 250 m² since around 2010. After 12 years of renovation and 14.4 million in renovation costs, the historically very important town hall shows a conspicuous number of defects and extensive moisture damage on the exterior walls and in the Ratskeller, which hosts a public exhibition on World Heritage.



Fig. 1: Hotel Kaiserworth and the two buildings of the Council Pharmacy (from left to right), at the most prominent location of Goslar, are all vacant. Photo: Henning Frase

¹ For a detailed report on this matter, see my paper in the World Heritage Watch Report 2023, pp. 87-90. <https://world-heritage-watch.org/content/wp-content/uploads/2023/06/WHW-Report-2023.pdf>



Fig. 2: Another iconic building of the historic town, Hotel Brusttuch, is also vacant. Photo: Henning Frase



Fig. 3: The prominent buildings of Hoher Weg 1 and 2–3 are vacant, too. Photo: Henning Frase



Fig. 4: The outside wall of the City Hall exhibits serious humidity after a 12-year restoration which had cost 14.4m EUR. Photo: Henning Frase

Imperial Palatinate and St. Ulrich's Chapel

Once the "most famous seat of power of the Holy Roman Empire" of national and European importance, it provides an insight into the glorious facets of the Middle Ages. It serves to represent the city and the Federal Republic of Germany as a

World Heritage Site. The building belongs to the state of Lower Saxony and is used by the city of Goslar.

The Imperial Hall displays a cycle of 68 murals, whose pictorial program shows the history of the imperial palatinate within the continuity of a Christian German imperial governance. Following extensive restoration work in 2002, there are clear cracks,



Fig. 5: The wall paintings of the Emperor's Hall, the main room of the Imperial Palatinate, show extensive flaking. Photo: Henning Frase



Fig. 6: Paintings cover all of the walls of the Emperor's Hall. Photo: Henning Frase



Fig. 7: Open joints in the exterior staircases of the Imperial Palatinate are up to 40cm deep. Photo: Henning Frase

and the paint layers are beginning to peel off. Open joints of up to 40 cm can be measured in the outer masonry of the stairs. In the Ulrich Chapel, open joints up to 30 cm deep are visible in the plinth area. The condition of the interior already described in 2023 remains unchanged.

The cathedral vestibule

The vestibule shown here was built in 1150 at the north portal of the three-aisled collegiate church of St. Simon and Judas near the imperial palatinate, which was built between 1047 and 1056. The monumental collegiate church was known as the cathedral, which is why the vestibule is called the “cathedral vestibule”. The exterior of the cathedral vestibule is richly decorated with sculptures, such as the church patrons Simon, Judas and Mathias, Emperor Henry III and others. The collegiate church was part of the Palatinate district; it was demolished in 1819-1822 due to a lack of funds for its upkeep.

An expert report on the state of its preservation has revealed damage to important areas of the building, which was to be repaired in three construction phases. The costs of the necessary renovations were estimated at around EUR 1m in 2019. So far, no known decisive construction measures have been taken to protect this historically significant building.



Fig. 8: The front façade of the cathedral vestibule.

Photo: Henning Frase

Town houses and other buildings

The vacancy and structurally poor condition of many privately used buildings is clearly visible. In addition, some of the buildings under the responsibility of the town of Goslar, such as Ulrich's Garden or the pavilion in the ramparts, are still in a poor state of preservation. Outside the old town, the mausoleums in

the Hildesheimer Straße cemetery, some of which are privately owned and others owned by the town, have been falling into disrepair for years without any effective measures having been taken.

The market fountain

The fountain consists of two bronze bowls arranged one above the other, and is considered one of the most important bronze castings from the Romanesque period. The lower bowl probably dates from the 12th century. The upper bowl was created between 1200 and 1230 and has had a clearly visible crack in it for many years. In addition, the golden crown of the city eagle has been damaged by vandalism for some time.



Fig. 9: The crack in the upper bowl of the market fountain.

Photo: Henning Frase

Dangers from heavy goods traffic

Due to the partial lack of weight restrictions in the narrow streets of the old town, and the difficult legal situation, there is visible damage to the road surfaces and adjacent buildings. Due to the difficult legal situation, this situation can only be changed by the public administration and politicians. However, no corresponding steps have been taken.



Fig. 10: Garbage trucks used by the municipality are too big and heavy for many streets of the old town.

Photo: Henning Frase

Measures for the preservation of the old town

As a party to the World Heritage Convention, the Federal Republic of Germany has made a commitment to the other 194 signatory states – i.e. de facto to the international community – to preserve the German World Heritage sites. It must therefore ensure domestically that it can fulfill this obligation. It is therefore called upon to do more to preserve the old town of Goslar, to support UNESCO in its efforts without being asked, and to submit regular reports on all World Heritage sites, such as detailed reports on the problems with the old town of Goslar. Specifically, this includes promoting a workshop process in coordination with the state authorities and the city of Goslar, in which structural issues relating to the protection and restoration as well as further funding opportunities can be discussed.

The following are also urgently required

- a significant increase in the staffing and expertise of the State Monuments Office in its responsibility for Goslar, as well as a significant increase in the staffing and expertise of the Lower Monument Protection Authority, which is appropriate to the scope and complexity of the monument stock, so that it can carry out the tasks assigned to it by law.
- On-site support for the Lower Monument Authority in the areas of public relations, on-site advice on recognizable building defects and preventive measures, support in the search for suitable specialist companies and engineers, and advice on the selection of the right building materials for the renovation of buildings.
- Professional qualification measures in the area of the city's building management for the refurbishment and maintenance of listed buildings.
- The inventory of the entire listed old town with regard to age, building condition, use, as well as all historic cellars, tunnels, corridors and former streams, and an inventory of the entire cultural heritage, including the inventory of cultural assets from the Hildesheimer Straße cemetery.
- Immediate creation of a World Cultural Heritage Management Plan for the old town as an economic basis and as a basis for future planning, with an urban development concept for Goslar as a whole, which identifies synergy effects between the individual parts of the town and the development of building land in the wider area.
- Monument area and design statutes for all areas of the old town, with a municipal funding program for restoration surveys.
- A professionally qualified and independent successor for the head of the municipal archive, who will leave at the end of 2024, as well as an immediate relocation of the historical building files as requested by the state of Lower Saxony.
- Examination and implementation of conservation measures for endangered architectural monuments through substitute measures or expropriation.
- Concept for reducing the road load of up to 40 tons in some areas to protect the public road space and adjacent buildings.

Plans to Damage the Integrity of Vienna's Historic Centre Continue

Herbert Rasinger, Initiative Stadtbildschutz



Fig. 1: View from the Upper Belvedere towards the historic centre of Vienna with a computer animation showing the visual impact of the "Heumarkt reduced" project.

Image: Initiative Stadtbildschutz

The "Heumarkt reduced" project is still too high

The revised design of the Heumarkt high-rise project submitted on 2023-08-18 by the city of Vienna is still 49,9m high. The maximum building height should be not more than 38 m, as required then by the city of Vienna in 1964. Therefore, the new project is still 11,9 m too high (Fig. 1).

Disregard of the UNESCO resolution and ICOMOS report on the Heumarkt area. The UNESCO World Heritage Committee has stated clearly and unequivocally since 2013 (!): "not higher than existing ones", because even the existing ones are actually already too high and disruptive.

Disregard of the Mission Report 2012 (ICOMOS) (see <http://whc.unesco.org/en/documents/122760>) which deals with the important iconic view from the Upper Belvedere Palace to the historic centre of Vienna.

- Page 14 MISSION REPORT - Historic Centre of Vienna (C 1033) (Austria) 17–20 September 2012 item 3.2.1.2
The mission states that this view has already been strongly disturbed:

The impacts of the urban developments on the city in the years since inscription have already reached a critical level. The accumulation of different interventions is reaching a stage that could begin to undermine both the authenticity and the integrity of the Historic Centre of Vienna.

- Page 18 MISSION REPORT – Historic Centre of Vienna – item 4.1.2
Other foreseen/planned major urban development projects
Urban Restructuring Process in the area of the Hotel Intercontinental – Vienna Ice-Skating Club – Wiener Konzerthaus

"With this project being planned, the challenge lies in the visual relationship between the building of the Hotel Intercontinental (volume, height) and Belvedere Palaces and garden. Currently, this hotel (constructed far before the inscription of the Historic Centre of Vienna on the World Heritage List) **strongly disturbs** the famous view from Belvedere. Therefore, **no increase to the buildings height** should be aimed at in connection with the redo.

On the contrary, it is warmly recommended to use this opportunity to **reduce the height** of the building and therefore reduce its negative visual impact."

Once again, no plans or information are provided for the high-rise project of the luxury apartments and the hotel. Also the Heritage Impact Assessment (HIA) by Michael Kloos sent to UNESCO on 21 December 2023 confirms the already high impacts on the OUV of the existing InterContinental Hotel for the iconic view from the Belvedere. Kloos: "The impacts on the OUV and attributes have to be assessed as <large – negative>". The maximum tolerable threshold has been reached already with the current building height of 38m.

Karlsplatz

Surrounding new superstructures on top of the adjacent buildings dwarf the St Charles church.



Fig. 2: St Charles Church and Ressel Park in 2017, and the Wienmuseum without superstructure in the foreground. The red lines show the planned superstructure on the Winterthur office building.

Photo: Initiative Stadtbildschutz



Fig. 3: St Charles Church and vicinity in December 2023. The Wienmuseum with the new superstructure and the new addition protruding towards the Ressel park.

Image: Initiative Stadtbildschutz

Although the State Party of Austria should have delivered the plans of the WMN (Vienna Museum new) before the start of the construction, they were only submitted to UNESCO too late in February 2024, 2 months after the building had already been constructed and opened to the public on 6 December 2023.

The visual impression of the most important baroque church in Vienna, the Saint Charles Church, is impaired by the unnecessary upscaling of the surrounding buildings as e.g. the Wienmuseum of the city of Vienna in 2023. Now, the owner of the 2nd building adjacent to the Saint Charles Church, the office building (Winterthur house), has been allowed by the City of Vienna in its land use plan P.D.8190 to build 3 stories on top



Fig. 4: St Charles Church and vicinity in 2024. The Wienmuseum with the new superstructure is on the left. The red lines show the planned 3-floor superstructure on top of the Winterthur office building.

Photo: Initiative Stadtbildschutz

of his office building just like the Wienmuseum was allowed in 2023. The SOC report 2024 unfortunately reaffirms that for the "Winterthur Building, the project presented during the Advisory Mission in 2018 remains valid."

This will result in a further deterioration of the historic appearance of the baroque St Charles Church in the Ressel public park in the near future.

Visit of a Reactive Monitoring Mission to Vienna in March 2024

A high-ranking UNESCO/ICOMOS/ICCROM-Monitoring Mission consisting of the

- Director of the World Heritage Centre, Lazare Eloundou Assomo,
- Project Specialist UNESCO CLT/WHC/EUR, Réka Virágos,
- Architect, heritage practitioner of ICOMOS, Nicholas Clarke,
- World Heritage Leadership Programme Manager, ICCROM, Eugene Jo

visited Vienna from 11 to 13 March 2024 and listened to the explanations of the Heumarkt high rise building project developer, the real estate tycoon Michael Tojner. Several civil society organisations were allowed to present their views on the high rise building project in a short 10 minute speech before this mission.

The above mentioned Heritage Impact Assessment (HIA) prepared by Mr. Michael Kloos in December 2023 has been presented for the first time to the public. This new HIA tries to argue that the heritage impact is **reduced** from "moderate-large negative" (-3.5) to "moderate negative" (-3.0) although the height of the planned high rise building has been **increased** from **38 m to 49,9 m** in height and extended to nearly 100m in width. This increase in height by 11,9 m is not visible in the blurred photos on page 122 and 124. These blurred photos are misleading.



Fig. 5: Excerpt from HIA by Mr. Michael Kloos, pages 122 and 124. The two photos give the false impression that the increase of the planned high-rise building by 11,9 m does not make a difference for the visual integrity of the Belvedere view.

Photos: michael kloos planning and heritage consultancy

The report of this **monitoring mission to Vienna** is expected for May 2024, two months before the upcoming 46th session of the World Heritage Committee which will take place from 21 to 31 July 2024 in New Delhi, India.

Management Plan 2021

Measures that have been pledged on paper, but have not been realized yet:

- Public relations and promotion of awareness of the world heritage site
- Promotion of awareness of heritage site have not been realized as promised on Page 133 of the management plan in 2021

It is regrettable that

- no information brochures have been produced on the world heritage site
- no dialogue formats exist to communicate the world heritage attributes
- pupils, students and young people in training have not been involved.

Recommendations

- Reduce the building height of the planned high rise buildings to **38 m**, the maximum allowable building height since 1964. This is the “acceptable threshold” defined in 1964 and reaffirmed by the Reactive Monitoring Mission 17–20 September 2012, item 3.2.1.2. as well in the HIA report by Michael Kloos of December 2023.
- The state party Austria and the city of Vienna want to present the UNESCO WHC with a fait accompli - as this was the case with high rise buildings Wien-Mitte in 2003.
- Abolish land use plan P.D.8190 allowing the superstructure on top of the adjacent Winterthur office building next to the St. Charles Church
- Abolish land use plan P.D.7984 allowing the high rise buildings with a building height up to +79 m in the core zone of the world heritage site on site of the Heumarkt ice skating rink.
- Establish the public relations and promotion of awareness of the world heritage site as promised in the management plan 2021 on page 133.

Venice has no more time

Jane da Mosto, We Are Here Venice



When I talk about World Heritage, I am including not only the sites that are currently recognised by Unesco as such but also considering the many places less “fortunate” than Venice in terms of catching the limelight – of which there are many that desperately need the international recognition of the WH Programme and the expertise of the WH Centre.

Specifically concerning Venice and its Lagoon, however, the continuing state of limbo is not only damaging public opinion concerning the integrity and value of Unesco’s WH Programme but also the fact that Venice itself is disappearing as a civilisation, as a living city as well as a physical reality.

The monuments are crumbling due to the chronic effects of rising water levels and the careless mass tourism industry. The precious wetlands in the lagoon have been allowed to erode to just one sixth of their former area due to the effects of shipping and unmanaged water traffic together with the institutional failure in terms of strategic long range planning to address the sediment deficit of the lagoon system and the need for an adaptive management approach to reconciling the operation of the flood barriers with the ecological state of the lagoon. Moreover, many infrastructural and development projects are ongoing and planned in Venice and its Lagoon that are strongly jeopardizing the values for which the site was inscribed in the World Heritage List.

Expansion of the Venice International Airport with a significant increase in the number of tourists (over 20 million tourists by 2037, approx. the double of the 11.6 million expected in 2024), the construction of a new hotel in the airport area facing the lagoon, of a multi-storey car park, in an area already under pressure for the construction of a stadium and sports facilities (Bosco dello Sport), together with new railway connections.

Another concern is the plan to dredge the Vittorio Emanuele canal to bring cruise ships back to the Maritime Station from Porto Marghera. Many other transformation projects are being planned within the Site and in its wider context. The State party and local authorities should have already notified the WHC and its Advisory Bodies according to UNESCO’s guidelines.

We are here Venice was founded in 2015 to fill a gap in Venice’s civil society - to help bring together the numerous experts and local organisations to weigh more than the sum of their parts. Our origins lie in the days of the first Reactive Monitoring Mission of Unesco’s WH Centre in 2015. A huge amount of work was carried out to give an opportunity to the representatives of the WH Centre, Icomos and Ramsar to hear directly from community groups and sources of local knowledge.

Without going into every detail of the past decade, the urgent need for a review of the Unesco “system” must be highlighted. From the Venice perspective we can witness what happens when there are no checks and balances on the methodology for producing the site’s management plan and the countless revisions. Lack of transparency and participation of civil society regards also the process of drafting of the HIA project whose outcomes are continuously postponed, so authorities at different levels are approving their projects making the HIA a mere intellectual exercise.

The fact that they are not produced independently but within the rems of a political force like the mayor of Venice, with the silent complicity of the many other authorities of the Steering Committee and also of the State Party, says a lot. And jumping to the latest session of the WH Committee in Riyadh, we witnessed a mirroring of the overriding diplomatic political influence in the voting process which makes dramatically useless any action to lead to a real change for the preservation of the World Heritage Site. Meanwhile, days, weeks, months and years pass, and Venice has no more time.

Safranbolu Municipality Plans to Open Natural Areas to Construction

İbrahim Canbulat, M. Arch.

Safranbolu, a city distinguished by its rich Ottoman-era architecture and urban fabric, is recognized as a UNESCO World Heritage site, embodying significant cultural and historical values. The preservation of Safranbolu's heritage has been a subject of considerable concern, particularly considering recent developments that threaten its integrity and the Outstanding Universal Value that warrants its UNESCO status¹. One of the primary concerns highlighted in this document is the absence of formally established buffer zones around Safranbolu's protected areas. Buffer zones are crucial for heritage conservation as they serve to protect the core heritage site from the adverse effects of development and other activities in adjacent areas. These zones can mitigate physical, visual, and social impacts, thereby preserving the authenticity and integrity of the heritage site. The document reveals that, while Safranbolu lacks designated buffer zones, the surrounding natural sites had implicitly served this protective function. However, with the opening of these natural areas for development, Safranbolu is left vulnerable to the encroachments of modern development, which could erode its historical character and cultural significance.

The development of natural sites is another critical issue that poses a direct threat to Safranbolu's cultural heritage. The document discusses the decision to open natural sites to construction, a move that disregards the protective buffer they once provided. This development not only deprives the heritage sites of their natural context but also exposes them to increased physical and social pressures. Such changes can have a profound impact on the heritage values of Safranbolu, potentially undermining the very qualities that justify its World Heritage status.

Moreover, the process by which these development decisions were made raises significant concerns. According to §172 of the Operational Guidelines for the Implementation of the World Heritage Convention, States Parties are expected to notify the World Heritage Committee of any major interventions in protected areas that may affect their Outstanding Universal Value. This notification should occur before any irreversible decisions are made, allowing the Committee to assist in seeking

solutions that preserve the site's heritage values. However, in Safranbolu's case, the necessary notification to UNESCO was overlooked, and the local authority proceeded with development plans without international consultation. This oversight highlights a gap in the adherence to international heritage preservation standards and emphasizes the need for greater accountability and collaboration in safeguarding Safranbolu's cultural heritage.

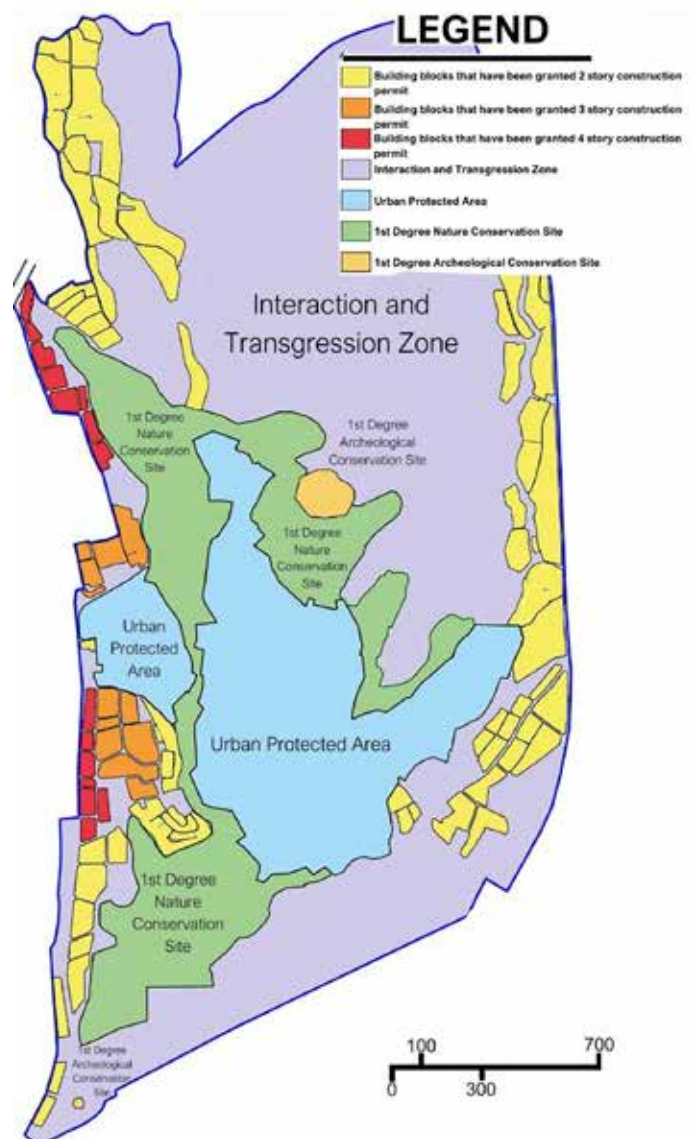


Fig. 1: Nature Conservation areas (green) of Safranbolu surround the historic city.
Source: Last revised City Conservation Plan.

¹ İ. Canbulat (2022). A New Development Plan Puts Safranbolu at Risk, in S. Dömpke, ed. World Heritage Watch Report 2022. Berlin: WHW, pp. 193–196.

In conclusion, the preservation of Safranbolu's cultural heritage demands immediate and concerted efforts. The establishment of formal buffer zones, the careful consideration of development impacts, and adherence to international guidelines are imperative to safeguard the city's historical and cultural legacy. The collaborative engagement of local, national, and international bodies is crucial to ensuring that Safranbolu's Outstanding Universal Value is protected for future generations, maintaining its status as a testament to Ottoman urban and architectural achievements. The development plans were taken from the page of the Provincial Directorate of Environment as a PDF. Area calculations have been tried to be made close to the truth of course with the margin of error in scaling to get an idea about the subject. An area of 5,000 m² in the region has been determined as a commercial area. Its zoning situation can be 0.25/0.50, that is, a 1,000 m² building, 10.50 m roof height from the road when it is leveled from the upper road, that is, it can be 2 floors. Considering that there will be a construction 13 m below the road due to the level difference in the land, 4 floors can be built below the road level and a total of 6 floors will be a commercial building.

Over time, the Center will begin to erode the Cultural Heritage Site, both physically and socially, in its south. It will attract more traffic to the Cultural Heritage Site on the road network, which currently does not have enough physical capacity. As a result, heavy traffic around the new center will create the need for wider roads and parking areas. The Bazaar will be isolated from all its surroundings if these Development Plans are implemented. As a result, the Cultural Heritage Site will lose all its authenticity.

New Concrete Buildings in Conservation Areas of Safranbolu²

Safranbolu, a UNESCO World Heritage Site, has been facing significant challenges due to new construction within its conservation areas: Çukur, Kiranköy, and Bağlar. Each area experiences unique pressures that undermine the authenticity and integrity of this historic town. In Çukur, the surge of concrete constructions and potential for more, risks transforming the urban landscape into one that's inauthentic, dominated by modern replicas that could lead to the decay of historic timber and mud-brick buildings. Kiranköy, once a non-Muslim settlement, now grapples with commercial expansion due to its proximity to the town center, while Bağlar's unique vineyard settlement pattern is being fragmented for new builds, diluting its historical essence with modern, incongruous structures.

The town's inclusion on the UNESCO list is credited to its distinctive architecture and socio-economic harmony, preserved



Fig. 2: A new reinforced concrete house under construction glimpses the site. Original morphology and top soil have been destroyed. Originally the site was a part of the Viranşehir Voyvoda's Palace.
Photo: İbrahim Çanbulat

over centuries. Yet, this harmony is disrupted by modern construction practices that overlook the cultural and historical context, further exacerbated by insufficient local efforts to halt this trend. The article calls for a reevaluation of UNESCO and ICOMOS guidelines to address the responsibilities of local authorities in safeguarding Safranbolu's heritage.

The criteria for UNESCO listing emphasize the interchange of human values, outstanding examples of architectural or technological ensembles, and traditional human settlements. Safranbolu's historical significance dates to the 6th century, serving as a crucial node on Roman caravan routes and developing into a socio-economic hub by the 18th and 19th centuries, with its unique urban and wooden house architecture.

The recent preference for reinforced concrete in new constructions, despite Safranbolu's earthquake-prone location and historical reliance on earthquake-resistant wooden structures, marks a significant shift. This transition not only affects the town's architectural heritage but also its socio-economic fabric, with tourism investments leading to the loss of social cohesion and authenticity.

I underscore the need for contemporary architectural interventions that respect Safranbolu's historical context, avoiding post-modern imitations and instead fostering a modern architectural design that harmonizes with the town's character. This

² İ. Çanbulat (2023). New Construction in Safranbolu, UNESCO World Heritage Town, in S. Dömpke, ed. World Heritage Watch Report 2023. Berlin: WHW, pp. 100-103.

approach requires immediate amendments to conservation plans and collaborative efforts among local stakeholders to preserve Safranbolu's unique heritage while accommodating contemporary needs. In conclusion, while new constructions can potentially enrich historical settlements, Safranbolu's current trajectory threatens its cultural heritage. A balanced approach, informed by UNESCO and ICOMOS guidelines and sensitive to the town's unique history and architecture, is essential for sustainable preservation and revitalization.

This plan carried a serious risk that could lead to the complete loss of the Safranbolu Heritage Site. The sad part was that the plan came into force with the approval of the Karabük Cultural Heritage Protection Board. I first conveyed the issue to the Turkish Commission for UNESCO.

Request for Immediate Action

According to § 82 of the Operational Guidelines, "Depending on the type of cultural heritage, and its cultural context, properties may be understood to meet the conditions of authenticity if their cultural values (as recognized in the nomination criteria proposed) are truthfully and credibly expressed through a variety of attributes including

- ...
- location and setting;
- ...

As we mentioned, the Safranbolu Cultural Heritage Site is an inseparable whole with the place it is settled in, and the way of settlement. On the other hand, the natural sites surrounding it are an inseparable complement to it, as well as protecting it from the pressure of the new settlements surrounding it. Again, the same plan for action:

The official authority deemed only the approval of the Karabük Regional Board for the Protection of Cultural Heritage, sufficient for these arrangements that would have an irreversible effect on the Cultural Heritage Site but did not consider it necessary to submit the plans to the UNESCO World Heritage Committee.

I made a presentation to the Ankara Branch of Chamber of Architects (of Turkey). They immediately put a lawsuit against the Ministry and assigned me as their official representative. I attended the first hearing and put my arguments. At the same session, the committee of experts submitted a report on the fact that there were significant technical errors in the plan, as well. We won the case. Eventually, the plan was rejected by the court on 12/01/2023. After this judgment decree, I personally recommended the mayor of Safranbolu Mrs. Elif Köse, to immediately make a new plan suggesting that the natural conservation areas be set as buffer zone. After one year, she has not put any action forward yet.

I reached out to the Head of the Committee for Reconstruction of Safranbolu Municipality. During my presentation I stressed that the inscription of Safranbolu in the UNESCO World Heritage List is due to "setting a standard in public and domestic architecture that exercised a great influence on urban development over a large area of the Ottoman Empire" (criterion ii) as well as "preserved its original form and buildings to a remarkable extent" (criterion iv). I shortly recommend them that I am not against new construction, but they should be using wooden skeleton. During the meeting the members suggested that a.) They do not know how to design wooden frame structures, b.) There is not enough qualified builders and c.) Structural wood cannot be found. I reject all those claims. Recently I was informed that the Committee is considering to take the risk of Safranbolu's transfer to the list of "World Heritage in Danger".

The challenges faced in managing UNESCO World Heritage Sites, as illustrated by the case of Safranbolu, are very instructive. The disconnects in communication and administrative oversight hinder effective preservation efforts. I emphasize the necessity for a robust, responsive system that can swiftly address threats to heritage sites, underscoring the importance of global cooperation, local commitment, and the urgent need for actionable plans that respect and preserve cultural legacies. Recommendations for amendments could include strengthening stakeholder engagement, improving transparency in decision-making processes, and establishing clear, enforceable guidelines for conservation and development in heritage sites.

Destructive Development at Hebron / Al-Khalil Old Town Site's Core and Buffer Zones

Alon Arad and Talya Ezrahi, Emek Shaveh

עמק שווה
عمق شبيه
Emek Shaveh

Hebron / Al-Khalil Old Town (Ref. 1565) was inscribed in 2017 as a World Heritage Site in Palestine based on the site's OUV following criteria ii, iv, and vi. The inscription was promoted on an emergency basis and the site was also listed in 2017 as a World Heritage Site in Danger. The nomination was promoted without a technical evaluation mission field visit to the property, as Israel would not grant permission for travel and access to

the Hebron H2 zone. During 2022–2023, and into 2024, the WHS sustained destructive development in several locations including: The Ibrahimi Mosque / Tomb of the Patriarchs (located in the “core zone”) and Dir al Arba'in / The Tomb of Ruth and Yishai (located in the “buffer zone”). This report aims to present destructive development at both locations.

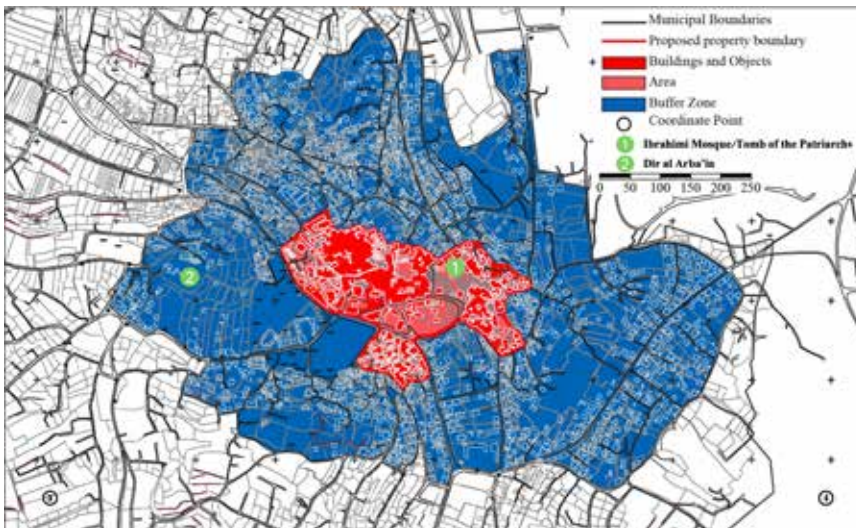


Fig. 1: Map of the WHS with the locations of the reported sites.

Source: UNESCO

Note on the Situation in Hebron

Since October 7th, Israel has tightened its control of the West Bank as a whole, and Hebron specifically. A lockdown was placed on several neighborhoods in Hebron for a few weeks, later to be replaced with heavy restrictions on movement throughout the city. Some of Hebron's Palestinian residents are prevented from accessing the Ibrahimi Mosque.

This joins the existing policy of restrictions and segregation in the Old City, which negatively impacts the WHS. While the property is registered under the State of Palestine, most of the Old City of Hebron is situated in area H2 and governed by Israel's Civil Administration (ICA).¹ The archaeological authority within the ICA, including the two reported locations, is the Staff Officer for Archaeology (SOA) unit, limiting the impact of the PA's Ministry of Tourism and Antiquities (MoTA), the Department of Antiquities and Cultural Heritage (DACH) and the Hebron Rehabilitation Committee. As such, factors affecting the OUV of the site stemming from Israel's actions are often beyond the control of the State Party as stated in the 2023 SoC Report on Hebron submitted by the State of Palestine.²



Fig. 2: Aerial photo taken by the Royal Air Force in 1945. Green: The Ibrahimi Mosque/Tomb of the Patriarchs; Red: Dir al Arba'in/The Tomb of Yishai and Ruth.

Source: Hebrew University Aerial Photography Archive

The Ibrahimi Mosque / Tomb of the Patriarchs

At the “Core Zone” of the WHS is the Ibrahimi Mosque / Tomb of the Patriarchs. The structure built in the 1st century BCE to protect burial sites attributed to the Patriarch Abraham / Ibrahim and his family consisted of a high wall delimiting a rectangular courtyard paved with tiles. The courtyard features structures dedicated to the biblical Patriarchs and Matriarchs whereas beneath the courtyard lie a series of ancient burial caves and built structures. This is the only Herod-era structure preserved in its entirety, mainly due to its holy status for the three Abrahamic religions. The site has attracted pilgrims for thousands of years.³



Fig. 3: The Ibrahimi Mosque / Tomb of the Patriarchs in Hebron / al-Khalil.

Source: Emek Shaveh

Over time, other structures were added in and around the complex including a Byzantine church later converted into a mosque following the 7th century Umayyad conquest and which continued alternating between church and mosque into the 13th century. The 14th century Mamluks added paths and stairs to the exterior of the Herodion structure, and built the Jawali mosque east of the original structure. Abutting the northwestern wall of the Herodion complex is the Yusufia structure associated with the tomb of Joseph, built in the 10th century CE.

The plan for the elevator was submitted to the ICA Higher Planning Committee in May 2020 without a documentation and conservation file nor with the approval of the SOA. Moreover the plan was submitted without a professional engineering impact assessment. Given only 60 days for public objections, Emek Shaveh (ES) submitted an objection together with Hebron residents⁴ based on a documentation file prepared by the conservation department of the Israel Antiquities Authority in 2013.

ES claimed that the lack of documentation and conservation files and the absence of an engineering impact assessment at the approval phase rendered the planning process deeply flawed.⁵ In addition, ES contended that the elevator structure



Fig. 4: The elevator at the Ibrahimi Mosque / Tomb of the Patriarchs in Hebron/al-Khalil.

Source: Emek Shaveh

would conceal the interface between the different architectural layers of the building, including the intact Herodion structure, the remains of the Crusader fortress and the Yusufiya structure, thus compromising the building’s authenticity and integrity. ES also noted that the plans were submitted without consulting or involving the State Party of Palestine, and contended that the construction of the elevator would violate international treaties to which Israel is a signatory including the 1st protocol of the 1954 Convention, and the 1972 Convention. The committee dismissed our objections.



Fig. 5: Section of balustrade dismantled to make room for the bridge leading to the elevator.

Source: Emek Shaveh

ES has been monitoring the construction process which began in 2022 and documented the dismantling of a section of a stairwell balustrade from the Jordanian period. The SoC Report for 2023 prepared by the State of Palestine states that “the contemporary steel construction associated with the elevator is adversely affecting the integrity of the architectural fabric of the property. This modern intervention is causing distortions to the traditional pattern of the property, further compromising its historical authenticity and overall traditional character.”⁶

In addition, we wish to note that the SOA has conducted a major archaeological excavation in the plaza of the site during 2022–2023. At this time the excavation report was not published and the excavated area was backfilled.⁷



Fig. 6: Satellite photos showing the changes at the Ibrahimi Mosque / Tomb of the Patriarchs.

Source: GovMap

Dir al Arba'in / The Tomb of Yishai and Ruth

Dir al Arba'in\The Tomb of Yishai and Ruth is a built compound located at the summit of the hill (936m asl), south of the Tomb of the Patriarchs/Ibrahimi Mosque and is part of the Tel Rumeida (ancient Hebron) archaeological site. Since 1967, Tel Rumeida was turned into a predominantly Jewish neighbourhood and a national park (declared in 2018) under the auspices of the ICA Parks Unit. It is undergoing a surge of development by the local Jewish settlers with government sponsorship. The compound, and Tel Rumeida as a whole are included in the WHS buffer zone.

Palestinians have not been given the permission to access and worship at the site, while the settlers launched a massive “renovation” project.

While other parts of Tel Rumeida were excavated several times, the compound was never systematically excavated, making information about the compound’s historical development limited to historical sources. The first mention of the site can be found in the 13th century as “the tomb of Yishai” (king David’s father). The identification also with the tomb of Ruth (David’s great-grandmother) is probably a later addition. Various writings until the 20th century reveal a complex history whereby the site has attracted many traditions and attributes, as a place for Jewish prayers, as a mosque and as a church (or monastery). Christian and Muslim traditions identified the site as the graves

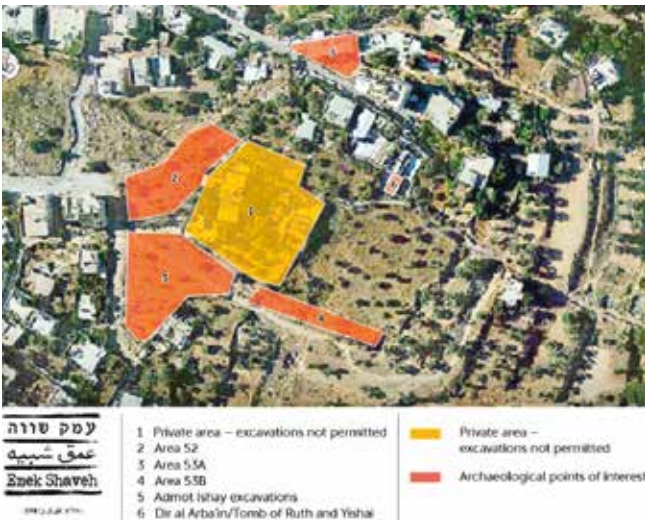


Fig. 7: Map of the archaeological sites in Tel Rumeida.

Source: Emek Shaveh

Since 1967, Jewish settlers have claimed ownership and took over the compound while limiting Palestinian access. During 1994, a military seizure order was issued for the compound and a guard post was established on its roof. The post remains in place following approval by the High Court of Justice (HCJ) in 2018 to extend the seizure order. A petition by Muslim Authority (Waqf) to Israel’s HCJ requesting access for Palestinians was dismissed following an order issued by the military that the Palestinians will be able to apply for permission to access the site. In addition, the military’s Central Command ordered the settlers not to conduct any permanent changes to the site. Since then,



Fig. 8: Satellite photos showing the changes at the Dir al Arba'in\The Tomb of Yishai and Ruth.

Source: GovMap

of 40 saints, therefore the name “al Arba’in” (“the forty”). Until 1967 the site was known as “Mashad al Arba’in” (the Mosque of the Forty) and served as a mosque for the local Palestinian community.

The PEF Survey of Western Palestine (19th century) provided the first ground plan of the compound, which remained almost identical until today. The compound is approximately 630 sqm and includes 4 structures and 3 courtyards enclosed by a high wall. ES documented changes to the compound during the past decade, and enhanced its monitoring during 2022–2024 due to the “renovation” project. The “renovation” damaged most of the compound’s structures, features and environs, including the dismantling of walls, floors and architectural features, conducting non-archaeological excavations within the compound’s perimeter, leveling the courtyards and removing original material from the site. This was accompanied by the construction of modern structures and features, installing modern infrastructure and using non-local materials. The works were carried out by untrained workers, without a conservation plan, and without guidance nor oversight by the SOA. The project seems to be violating almost every local and international law regard-

ing the development of heritage sites, undermines professionally accepted preservation guidelines, and therefore, resulted in heavy damage which compromises the compound’s authenticity and integrity. The fact that the compound was not excavated meant that it held significant research potential rendering it also highly vulnerable to modern development. The damage caused by the “renovation” project means that we will not be able to fully understand the archaeological story embodied in the destroyed remains.

Recommendations

The World Heritage Committee should

- Remind Israel, as the occupying power, of its obligations as a signatory to the 1954 Hague Convention and its first Protocol.
- Remind Israel, as the occupying power, of its obligation as a signatory to the 1972 Convention to respect the status of the WHS, to protect the OUV of the site and to cooperate with the state under whose auspices the property is inscribed
- Include the removal of the elevator and the restoration of the balustrade as a condition for achieving the desired state of conservation.
- Include the removal of all modern construction, the dismantling of the military facility and the needed for corrective actions at the Dir al Arba’in / The Tomb of Yishai and Ruth compound as a condition for achieving the desired state of conservation.



Fig. 9: Dir al Arba’in / The Tomb of Yishai and Ruth in 2014–2015.

Source: Emek Shaveh

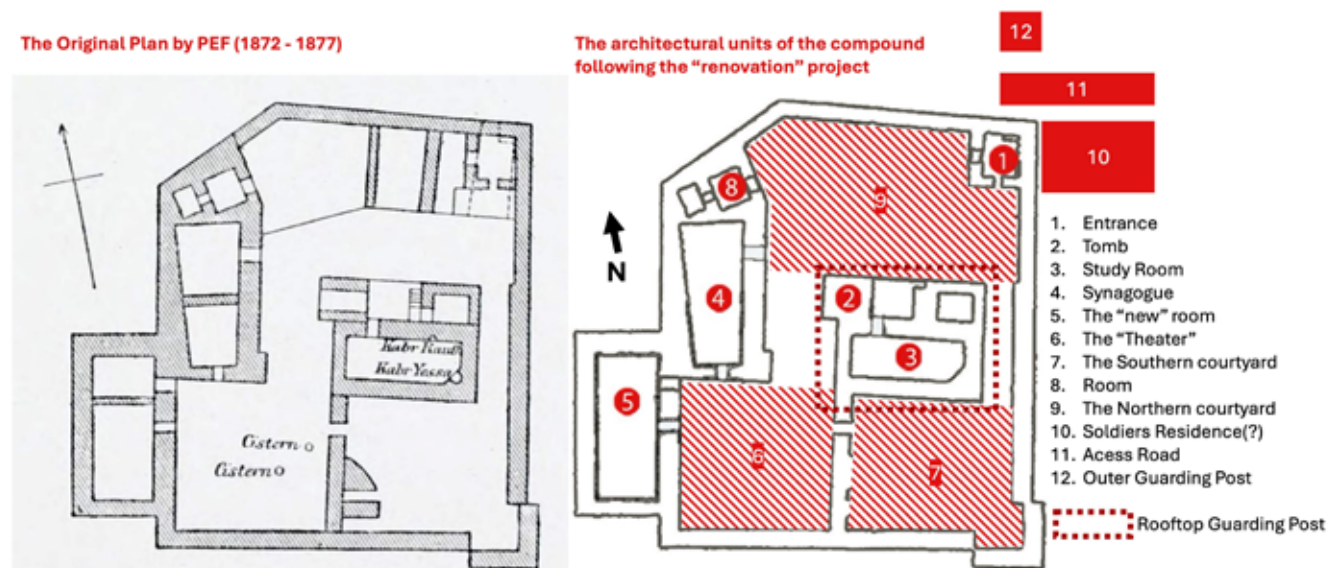


Fig. 10: Dir al Arba’in / The Tomb of Yishai and Ruth plan and developments. Sources: left: PEF Survey of Western Palestine; Right: Emek Shaveh, based on the PEF plan



Fig. 11: Dir al Arba'in / The Tomb of Yishai and Ruth before and after the "renovation".

Source: Emek Shaveh



Fig. 12: Dir al Arba'in\The Tomb of Yishai and Ruth before and after the "renovation."

Source: Emek Shaveh. The 2011 Synagogue photo taken from Wikipedia, by Daniel Ventura



Notes

- 1 Protocol on the Redeployment in Hebron (1997) - <https://peacemaker.un.org/israelopt-redeploymenthebron97>
- 2 SoC Report al-Khalil/Hebron 2023 - <https://whc.unesco.org/en/list/1565/>
- 3 Hebron/Al Khalil Old Town on UNESCO website - <https://whc.unesco.org/en/list/1565/>
- 4 Emek Shaveh's objection to the "accessibility project", June 18th 2020, <https://bit.ly/emekshaveh-hebron>
- 5 Ibid p.5
- 6 see note 4 above
- 7 Partial information about the excavation and its results can be found in two lectures in the 12th (2022) and 13th (2023) Conferences for the Research of Hebron and Judeh (in Hebrew): 2022 - <https://rb.gy/jp762t> and 2023 - <https://rb.gy/nai4uv>

III. Cultural Landscapes and Mixed Properties

The Intended Zipline on Rio de Janeiro's Sugar Loaf Mountain Remains Strongly Contested

André Ilha, Grupo Ação Ecológica (GAE)



Sugar Loaf is a tall granite cone which stands sentinel at the entrance of the Guanabara Bay in Rio de Janeiro. Together with the neighbouring Morro da Urca, a more rounded hill, it forms one of Rio's most iconic postcards, only rivalled by the statue of Christ the Redeemer atop Corcovado, an even taller rocky peak in the vicinity.



Fig. 1: Sugar Loaf, of worldwide fame, listed by the Historical and Artistic National Heritage Institute and declared a natural protected area by Rio de Janeiro's municipality, before the zipline nightmare began.

Photo: André Ilha

Since 1912 a private company, CCAPA in the acronym, runs a cable-car service to the top of the two mountains, and millions of people have undergone this two-stage trip to enjoy a privileged view of a city that grew up squeezed between sea and mountain. For this very reason, it was awarded by UNESCO in 2012 the title of first urban cultural landscape, namely "Rio de Janeiro: Carioca Landscapes Between the Mountain and the Sea". The certificate was received by mayor Eduardo Paes himself, who then said that that honour "would help to preserve the city's landscape and avoid works which might ruin it". A little less than a decade later he is mayor again, and unfortunately not doing justice to his own words.

Besides running the cable-car and some support activities like bars, restaurants and souvenir booths, CCAPA has always tried to expand aggressively its domains down the two hills, and even in the forest between them, with major projects who came in waves to threaten the whole place. In the early 70's, for example, when it was about to substitute the old machin-

ery for a new one, the company produced an ugly project for a three-storey restaurant at the top of Sugar Loaf. Leading Brazilian artists and intellectuals mobilized against it, what eventually led to both hills being listed as National Heritage by Iphan (Historical and Artistic National Heritage Institute) in 1973, and the project was filed.

In the early 90's, when Rio was in a frenzy due to the imminent hostage of the II United Nations Conference for the Environment and Development, the Rio-92, CCAPA tried to get the approval for an amphitheatre in the forest connecting the two mountains, along with bars, toilets and statues of the characters of a popular comic strip, but it was rejected by the municipality. In the early 2010's, regardless the fact that the area had become legally protected a few years earlier in the form of the *Pão de Açúcar and Morro da Urca Natural Monument*, CCAPA tried to establish a whole new line of the cable-car linking the top of Morro da Urca to nearby Morro do Leme, an elevation overlooking the Copacabana Beach, as well as an extra line from that hilltop to the ground. The ensuing fight took years, and finally came to an end when the City Council passed a bill explicitly prohibiting such non-sense, due to the impact on the landscape, on the traffic and in the daily life of its neighbours.



Fig. 2: Artistic conception of the complete set of interventions proposed by the company for the top of Sugar Loaf, readily nicknamed as "Castle of Horrors" by its opponents. The massive structures planned make it clear that the zipline is just the appetizer.

Computer animation: CCAPA's Masterplan

Now, an even greater onslaught against the two hills is being staged by CCAPA in its never-ending pursuit of converting them into a major entertainment hub, a feverish mix of amusement park, show hall and shopping centre. If successful, this plan

would spoil irretrievably the character of the visitation there, and the multiple zipline between both hills, the craze of the moment, should be seen as just the spear tip of a much bigger enterprise behind it.

CCAPA submitted to Iphan in 2020 a project to build a sturdy zipline where four customers could slide simultaneously down a steel cable at an approximate speed of 100 km per hour, in a 50 seconds trip, from early morning to sunset (if not through the night as well), in a total of roughly 1,000 “take-offs” per day. The licensing proceedings went on in secrecy up to mid-2022, when the project was finally disclosed to the Pão de Açúcar Natural Monument Consulting Board, composed of governmental and non-governmental organizations somehow related to the area. While most NGOs, for various reasons, stood

against it, the public agencies, most of which are subordinated to Mr. Paes, who publicly expressed his enthusiastic approval for the project, did their best not to displease the mayor, even in the face of its obvious legal flaws.

The project has several major problems, each of them sufficient to singlehandedly halt it for good. As an example, the structure’s foundations, started on September 2022 without previous approval from Iphan, clearly violate cultural heritage and environmental laws, and the extent of the damage was only disclosed to the public in the beginning of 2023, when rock climbers photographed and filmed employees drilling and dismantling large chunks of rock, as well as a great spill of white rock dust going all the way down from the top of the west face of Sugar Loaf to the ground hundreds of meters below.



Fig. 3: The image which caused a stir in Rio de Janeiro when publicized: the removal of dozens of cubic meters of rock from the top of Sugar Loaf for the construction of the upper station of the zipline. *Photo: Movimento Pão de Açúcar sem Tirolesa*



Fig. 6: After the judicial embargo, the company covered everything with thick green canvas to hide from visitors the extent of the damage already done. *Photo: André Ilha*



Fig. 4: Ongoing works on the upper (Sugar Loaf) station of the zipline before the judicial embargo. *Photo: Movimento Pão de Açúcar sem Tirolesa*



Fig. 7: A large extent of Sugar Loaf’s cable car station is bordered today by this swathe of green canvas to prevent visitors from seeing a whole new catwalk built a few meters below on a natural rock slab. Incidentally, it also prevents people from enjoying adequately the landscape they paid for. *Photo: André Ilha*



← Fig. 5: Rocks removed from the top of Sugar Loaf awaiting to be taken away. *Photo: Movimento Pão de Açúcar sem Tirolesa*



Fig. 8: An aerial view before everything was covered up in canvas. The left arrow shows a new catwalk being built on a natural rock slab, a structure not mentioned in the slide show prepared by the company to promote the zipline project. The right arrow shows the “take-off” deck of the zipline, built well beyond what was depicted in the same presentation. Photo: Movimento Pão de Açúcar sem Tirolesa



Fig. 9: Artistic conception of the interventions proposed by the company for the top of Morro da Urca – and there is more off-image. The company requested an increase of about 50% in the constructed area of all three stations of the cable car. Computer animation: CCAPA’s Masterplan



Fig. 10: Suggested activities by CCAPA for the top of Morro da Urca. Source: CCAPA’s Masterplan

This has prompted a loud reaction from environmentalists, urbanists, dwellers of the surrounding neighbourhoods, regular visitors of the National Monument and other angry citizens alike against what they saw as an aggression to a very praised natural and cultural symbol of Rio de Janeiro, with a scheduled removal of no less of 159 m³ of rock for it. A strong spontaneous movement was then created to withstand the zipline, as well as the announced masterplan for a massive further occupation of both hills and the ground station of the cable-car

at the Praia Vermelha Beach. This would represent an average increase of 50% in the overall constructed area to accommodate many more shops, catwalks, a theatre and, last but not least, plenty of room for other as yet unspecified equipments like the zipline, in what its opponents nicknamed “The Castle of Horrors”.

The company’s plans for the area go in the exact opposite direction of what other large cities in the world, most notably in



Fig. 11: On Morro da Urca, the impact of the zipline station is perhaps even greater than that on Sugar Loaf, as a huge platform began to be built over another natural rock slab before being embargoed by a federal judge. *Photo: André Ilha*



Fig. 12: The space once dedicated for the enjoyment of the view of the West Face of Sugar Loaf from the top of Morro da Urca is now partially hidden by large green sidings and canvas covers tightly fastened to anchors. *Photo: André Ilha*



Fig. 13: A huge yellow structure of a panettone factory during Christmas time added to the aura of reckless mercantilism that prevails today on top of both hills. *Photo: André Ilha*



Fig. 16: Despite its low quality, this is a rare image of the platform being built before the judicial embargo and its subsequent concealment by large green canvas covers. Is such an expansion acceptable? *Photo: Movimento Pão de Açúcar sem Tirolesa*



Fig. 14: The zipline arrival station atop Morro da Urca would be a vast new platform supported by high concrete pillars, to let it level with the existing cable car station. *Photo: Movimento Pão de Açúcar sem Tirolesa*



← Fig. 15: Not only the foundations, but also the pipe scaffolding used in the construction of the platform on Morro da Urca severely damaged the natural rock slab below. *Photo: André Ilha*

Europe, are carrying out: the re-naturalization, wherever possible, of their heavily urbanized areas. Here, on the contrary, we now have an extraordinary natural asset heavily endangered by greed, for the sole purpose of CCAPA's owners become even richer after their century-long exploitation of the place.

In a mostly surprising move, Iphan, when it finally took notice of what was going on there, instead of stopping the works immediately, fining CCAPA for the lack of a license and enforcing the dismantling of it all, as was to be expected, shut its eyes to the clear legal restraints and gave CCAPA a green light to go ahead. This prompted the Public Attorney's Office (PAO), based on a formal complaint filed by Grupo Ação Ecológica (GAE), a local NGO, to sue both CCAPA and Iphan in the federal justice. It managed to get a provisional embargo until the final judicial sentence, and triggered an investigation by the Federal Police due to the possible commitment of environmental crimes by their respective staffs. Besides the duty of restoring the natural profile of the rock (as far as possible, of course), a R\$50 million fine (roughly US\$10 million) was asked as "moral collective damage" to a relevant national heritage site.

It has been a fierce struggle since then. CCAPA hired four major law firms and one of the mostly acclaimed architectural firms in Brazil to its assistance, as well as a publicity agency which overflowed the media with pro-zipline ads, in a multi-million campaign which remains in stark contrast with the means at the disposal of its opponents, all of them volunteers who engaged in this fight to preserve one of Brazil's most acclaimed natural and cultural assets. Numerous non-profit organizations of architects, urbanists and engineers, as well as the Resident's Associations Federation of Rio de Janeiro enlisted in this war as well. This has been done mostly through social media, since the big papers and magazines, who profit with the paid advertisements, do not give balanced reports on the issue, rather the contrary.

Of utmost importance was the intervention of the local branch of the International Council on Monuments and Sites (ICOMOS), who informed UNESCO what was going on and pointed out the significant damage to the site, besides the defacing of the cultural environment which is one of the key elements that led to the designation of Rio de Janeiro as an urban cultural landscape. A formal proceeding was open in UNESCO, which might eventually lead the city to lose that innovative title, what would be a shame. ICOMOS managed to be accepted as *amicus curiae* in the lawsuit to assist the judge with the more technical aspects involved. The World Heritage Watch (WHW) is also strongly involved in the case, attesting the damage on the site and in the landscape that might occur if the zipline weren't barred. GAE now is the Focal Point of WHW for the WH Site of Rio de Janeiro Cultural Landscape.

And there is more to it. Some of the most prominent specialists on structural geology and geotechnics in the country have

pointed out a serious flaw in the project of the zipline's foundations, particularly on the steep upper slopes of Sugar Loaf. The problem is that the rock there, a rare type of gneiss formed by successive layers, might slip off if the foundations were not preceded by indispensable geological probes and other technical essays, which were not done. This means that the whole structure, to borrow one expert's words, might collapse "in an accident of catastrophic proportions", endangering the lives of costumers, operators and visitors below alike. This unexpected negligence was also a major point in the suit filed by the Public Attorney's Office.

There would also be the unpleasant noise caused by up to a 1,000 costumers per day screaming hysterically, as people usually do, on their minute-long ride down the four parallel lines of the intended zipline. That would be a constant annoyance to the visitors of the National Monument – hikers, climbers, bird-watchers –, regulars in a public protected area which would then have the quality of their experience deeply affected by the predictable behaviour of the costumers of a commercial undertaking above them.

Surprisingly, on late February CCAPA managed to obtain a judicial decision lifting the embargo on the works while we all wait for the merit sentence. This outrageous happening, while theoretically does not interfere with the ultimate outcome of the dispute, of course poses extra difficulties for the complete undoing of it all, if this comes to be the final decision as we expect. The PAO is trying to reverse the situation, and the WHW prompted the World Heritage Centre to include the Rio de Janeiro Landscape in the registry of endangered World Heritage sites, and hopefully UNESCO will soon send a special mission to Rio to assess the problem directly.

All that said, we hope that the PAO's suit, as well as the inevitable appeal by CCAPA, have a favourable outcome, scaring away, once and for all, the ghost of the zipline. Meanwhile, an even greater clash is already going on with CCAPA around its outrageous project to extend in circa 50% the constructed area of all the three cable-car stations. Hopefully this idea will not even take off as the zipline did, but it is urgent to open debate on what the cariocas (this is how Rio's inhabitants call themselves) really wish for those two iconic mountains in their beloved city. They could either remain a place for peaceful contemplation of a unique landscape in the world, or be turned into a frenzied gathering of people attending shows and other events, playing in amusement park's toys—the zipline being just one of them—, and shopping. There is nothing intrinsically wrong with these activities, but they could, and should, be done elsewhere. Simple as that.

Latest News: On 8 April, the Regional Prosecutor of Rio de Janeiro decided to suspend the construction of the zip line until a decision by a higher level court will have been taken.

New Construction at the Curonian Spit Threatens its Outstanding Universal Value

Ecodefense!



After the outbreak of the war in Ukraine and the breakdown of relations between the Lithuanian National Park and the Russian Curonian Spit National Park, the status of the Curonian Spit World Heritage Site was greatly weakened, since joint management of the international site was no longer an option. If previously the parties prepared a joint report, which was then sent to the UNESCO World Heritage Committee, now both Lithuania and Russia send their own reports separately and, accordingly, practically do not know what is going on with their neighbors. The buffer zone of the National Park in the Russian Federation designed after repeated requests by the World Heritage Committee has not been legally established.

The Russian Federation, who habitually ignores international agreements, is in no hurry to inform the Committee about various alarming events taking place in the Curonian Spit National Park: neither about the catastrophic destruction of the sea coast^{1,2}, nor about the extreme pollution of the Curonian Lagoon, nor, finally, about a new investment project for the construction of an artificial island.

On the territory of the Curonian Spit National Park in Russia ("Curonian Spit" World Heritage property #994) and in the adjacent waters of the Curonian Lagoon (the buffer zone of the "Curonian Spit" World Heritage property), preparatory works for the construction of a recreational complex and a marine terminal have begun^{3,4}. All permits have already been received for the implementation of this project.

In our opinion, the facts presented can significantly affect the Outstanding Universal Value of the property and its connection to other heritage areas.

In September 2023, information appeared about the investment project "Construction of an international passenger border checkpoint on the river, a protective pier, a hotel and recreational complex and reconstruction of hydroengineering facilities in the village of Rybachy, Zelenograd Municipal District of the Kaliningrad Region"⁵.

At the same time, in April 2023, when the EIA was not yet ready and, accordingly, an environmental assessment was not carried out, there was no construction permit, the implemen-

tation of the 1st stage of the project had already begun – the demolition of existing buildings on the land plot and clearing of the territory^{4,6} (Fig. 1-2).



Fig. 1–2: Without waiting for the conclusion of an environmental assessment and a construction permit, the investor clears the land for construction. Rybachy village, Curonian Spit. March 21.2023.

Source <https://kgd.ru/news/society/item/104077-gory-kamnej-i-poplavkov-na-kurshskoj-kose-snesli-neskolko-zdanij-dlya-stroitelstva-turisticheskogo-klastera>

As part of this project, it is planned to create an artificial land plot in the waters of the Curonian Lagoon adjacent to the Rybachy village (Fig. 3–4). Rybachy village is located within the boundaries of the World Heritage property, the adjacent waters are the buffer zone of the property. It is also planned to use land plots within the boundaries of the national park itself.



Fig. 3-4: Schemes for the placement of an artificial land plot.

Source: Draft permit for the creation of an artificial land plot, volume 1, 2023.



There is no mention in the project materials that the project will be implemented on the territory of a UNESCO World Heritage Site. There is no information in the project materials that the World Heritage Committee was properly notified of such a large-scale construction.

The only mention is in the expert's statement that the Curonian Spit is a UNESCO World Heritage Site is available only in the minutes of the meeting of the Scientific and Technical Coun-

cil of the National Park dated November 15, 2022. The director of the Rybachy Ornithological Station of the Institute of Zoology (Russian Academy of Science – RAS) stated that "the concept does not take into account the authenticity of the Curonian Spit and violates cultural appearance of a World Heritage site"⁴ The protocol was attached to the materials of the island construction project as an annex, but the statement was not reflected in any way in the project design.

According to the disclosed project documentation^{3,4}, by backfilling the territory and dredging in the coastal waters, an additional land plot will be created on an artificial island. The new 7.9 ha bulk area will be used for the construction of a 3-5-storey apartment hotel, a 5-storey apartment hotel, a 5-storey hotel, a hotel on the water, outdoor pools, 1-2-storey restaurants with terraces, covered parking and bus parking, offices of various services, emergency departments, shops, etc (Fig. 5). According to the investor's plans, the height of the main facilities is up to 21 meters.

It is planned to build a marine terminal and port infrastructure, since the opening of an international maritime checkpoint is planned in Rybachy village. This is a very adventurous idea, since Russia does not have a direct exit from the Curonian

Lagoon to the Baltic Sea, and the border crossing on the Curonian Spit was eliminated on the Lithuanian side after the start of the war with Ukraine (Fig. 6).

It seems that this investment project, if implemented, will have a significant negative impact on the natural and cultural complexes of the World Heritage site. The "Preliminary ESIA" found in the abovementioned documents completely ignores requirements to heritage impact assessments and does not pay atten-



Fig. 5: The planned international passenger river checkpoint, a protective pier, a hotel complex on an artificial island in the Rybachy village on the Curonian Spit, Russia. Source: Draft permit for the creation of an artificial land plot, volume 1, 2023.

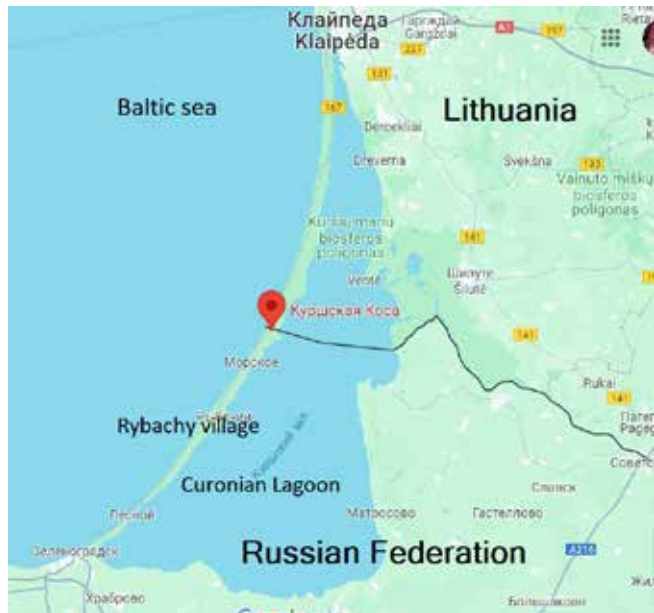


Fig. 6: Curonian Spit, Russia does not have a direct exit from the Curonian Lagoon to the Baltic Sea.

Source: Google maps <https://www.google.com/maps/place/%D0%9A%D1%83%D1%80%D1%88%D1%81%D0%BA%D0%B0%D1%8F+%D0%9A%D0%BE%D1%81%D0%B0/@55.2789468,20.3090887,9z/data=!4m6!3m5!1s0x46e497eb3fefd383:0x392ee279a401617318m2!3d55.2783333!4d20.9683333!16zL20vMDjseTRj?authuser=0&entry=ttu>

tion to conservation requirements for the World heritage property as such.

The investor announced a large-scale reconstruction of hydraulic facilities, “restoration of the coastal strip” by backfilling the soil, deepening the fairway in the bay, and cleaning the bay from silt and bottom sediments. The investor believes that he is able to solve the annual problem of strong algal blooms in the bay, which interferes with the organization of mass beach holidays on the shores of the bay.

From the Draft Permit for the Creation of an Artificial Land Plot (section ‘Factors and circumstances that determined the need to create an artificial land plot’, p.3)³ follows:

“2. The formation of a large amount of bottom soil during dredging in the inner waters of the bay chosen for the port will

make it possible to restore the coastline and create the territory by backfilling”.

Further, the “Environmental effect” section (p. 4) reports ‘3. The implementation of the Investment Project will make it possible to clean the internal waters of the bay from silt deposits (including carcinogenic ones), the formation of which is caused by unorganized discharge of untreated wastewater from domestic sewage into the waters of the Curonian Lagoon’.

In other words, the investor plans to build an island from soils extracted from the bottom of the bay, contaminated, in his own words, with toxic and possibly carcinogenic substances, and further in the EIA materials he states that the project will not cause significant harm to ecosystems. But this is not surprising, but the fact that the investor received support and has already started implementing the project.

As for the attitude of the administration of the Curonian Spit National Park, the agreement of intent for the implementation of an investment project was signed by the investor and park director Anatoly Kalina on May 5, 2022, immediately after the meeting of the Scientific and Technical Council of the National Park, held on April 28, 2022⁴. Council members voted for implementation unanimously and without comments. At subsequent council meetings, individual proposals and comments were made, none of which were included in the project documentation.

In particular, according to the minutes of the meeting of the Scientific and Technical Council of the Curonian Spit National Park dated 11.15.2022 No. 51, the director of the Atlantic Branch of the Institute of Oceanology RAS drew attention to the fact that preventing erosion in a local area (thanks to the construction of a pier) will lead to erosion in an adjacent one⁴. This remark remained unanswered.

At the Council meeting on April 6, 2023, a researcher at the Atlantic Branch of the Institute of Oceanology of the RAS drew attention to the fact that the schedule of dredging work specified in the project coincides with the time of spawning and development of whitefish, one of the most valuable fish species of the Curonian Lagoon, for the restoration of the population of which significant state funds are spent annually⁴. The project deadlines have not been changed, however.

At the Council meeting on November 15, 2022 the director of the Rybachy Ornithological Station of the Zoological Institute of the RAS said that a new light spot will appear on the Curonian Spit – a hotel complex with heights of up to 21 m, which could affect the avifauna⁴.

Note, the construction of high buildings with a large number of glass surfaces and bright lighting on the Baltic Bird Migration Route will inevitably lead to the mass death of a significant

number of birds in the Curonian Spit National Park. The site chosen for construction is adjacent to the central part of the Curonian Spit National Park, in the place of the highest concentration of migratory birds.

The Project documentation was approved by experts and authorities despite the fact that among the possible types of impact on the environment is the irreversible alienation of part of the water area with disruption of the local hydroecosystem and damage to aquatic biological resources; temporary pollution of the aquatic environment with suspended substances, harmful impurities and pathogens from dumped soil with waste water; air pollution during the operation of road construction equipment and vehicles; noise impact during operation of technical equipment; pollution of surface and ground waters; littering the area with waste.

As for the EIA, the entire procedure has been violated. Public discussions on the project took place from September 1 to September 15, 2023. Public participation consisted of receiving written comments; there was no public discussion of the project. Even scientists learned about the project from the media, as follows from their letter to the Russian Ministry of Natural Resources. In February 2024, the NGO 'Expert Council on Conservation matters' sent an open letter to the Russian Ministry of Natural Resources, highlighting the threats this project poses to migratory birds and other wildlife. Large-scale construction will also change the cultural landscape. Authors of the letter argue that the ESIA for the project does not properly analyze a lot of other impacts⁷.

According to the Operational Guidelines (paragraph 172), the World Heritage Committee invites the States Parties to the Convention to inform the Committee, through the Secretariat, of their intention to undertake or to authorize in an area protected under the Convention major restorations or new constructions which may affect the Outstanding Universal Value of the property. Notice should be given as soon as possible (for instance, before drafting basic documents for specific projects)

and before making any decisions that would be difficult to reverse, so that the Committee may assist in seeking appropriate solutions to ensure that the Outstanding Universal Value of the property is fully preserved.

Therefore, according to established tradition^{8,9}, the responsibility to notify the UNESCO World Heritage Committee is assumed by public organizations: Ecodefense!, the Rivers without Boundaries coalition and the World Heritage Watch network, which have prepared detailed appeals.

In our view, the proposed construction can lead to the destruction of unique natural ecosystems and cultural landscape, and therefore will negatively affect the Outstanding Universal Value of the property.

References

1. <https://ecodefense.ru/2022/02/02/curonian-spit-destruction/>
2. <https://ecodefense.ru/2021/11/24/return-of-sand-disasters/>
3. Draft Permit for the Creation of an Artificial Land Plot <https://zelenogradsk.com/zemlya-imushestvo/%D0%A2%D0%BE%D0%BC%201%20%D0%9F%D1%80%D0%BE%D0%B5%D0%BA%D1%82%20%D1%80%D0%B0%D0%B7%D1%80%D0%B5%D1%88%D0%B5%D0%BD%D0%B8%D1%8F%20%D0%BD%D0%B0%20%D1%81%D0%BE%D0%B7%D0%B4%D0%B0%D0%BD%D0%B8%D0%B5%20%D0%98%D0%97%D0%A3.pdf>
4. Justification for the Creation of an Artificial Land Plot chrome- <https://www.zelenogradsk.com/zemlya-imushestvo/%D0%A2%D0%BE%D0%BC%202%20%D0%9E%D0%B1%D0%BE%D1%81%D0%BD%D0%BE%D0%B2%D0%B0%D0%BD%D0%B8%D0%B5%20%D1%81%D0%BE%D0%B7%D0%B4%D0%B0%D0%BD%D0%B8%D1%8F%20%D0%98%D0%97%D0%A3.pdf>
5. <https://rugrad.online/news/1347693/>
6. <https://kgd.ru/news/society/item/104077-gory-kamnej-i-poplakov-na-kurshskoj-kose-snesli-neskolko-zdanij-dlya-stroitelstva-turisticheskogo-klastera>
7. <https://kgd.ru/news/society/item/108069-uchjonye-stroitelstvo-vysotnyh-zdanij-v-turkomplekse-na-kurshskoj-kose-privedjot-k-massovoj-gibelj-ptic>
8. <https://ecodefense.ru/2020/12/09/kk/>
9. The Curonian Spit: In Danger of Losing Its Outstanding Universal Value Report to the UNESCO World Heritage Committee, December 2020 <https://ecodefense.ru/wp-content/uploads/2020/12/report-on-world-heritage-property-no.-994-curonian-spit.pdf>

Motorised Use of Green Lanes in the Lake District Continues After UNESCO Decision

Lake District Green Lanes Alliance

We would like to alert you to a recent development concerning the World Heritage Committee's decision on green lanes in the Lake District. The Lake District National Park Authority is conducting a further survey on the High Tilberthwaite route, appearing to disregard the World Heritage Committee's directive adopted at its 45th Session in Riyadh in 2023.

The decision leaves no doubt as to what is required from the LDNPA, in addition to the systematic monitoring of routes: *"to harness the already available instruments to prevent vehicular access to unsealed roads in highly sensitive and emblematic valleys"*.

Langdale, and in particular Little Langdale, is such a valley. In the Nomination Dossier (Vol 2, p. 16) Langdale is described as an 'iconic location', with the following attributes of OUV: key literary and artistic associations; key associations with climbing and the outdoor movement; opportunities for quiet enjoyment and spiritual refreshment; development of a model for protecting cultural landscape; conservation movement. All these aspects of OUV also apply to the Coniston valley.

It should be noted that nowhere in the Nomination Dossier is motoring mentioned as a traditional Lake District activity. When the LDNPA does refer to recreational motor vehicles it does so in the context of "conservation battles" and by pointing out that motor vehicles have been banned on the Walna Scar route. By contrast, the LDNPA's 2019 Tilberthwaite Assessment report asserts that motorised use of the Tilberthwaite route is "very much part of the cultural history of the Lake District."

A further survey

The LDNPA has now chosen to subject the High Tilberthwaite to Little Langdale route to a further survey, rather than using the available evidence to close it to motor vehicles.

This historic cart track embodies key attributes of OUV: it lies on land which Beatrix Potter bought for the nation then handed over to the National Trust for conservation, a connection which ICOMOS highlighted as a significant part of the area's conservation legacy in its May 2019 technical review. A biographer of Beatrix Potter wrote that Potter would have been appalled

at the sight of convoys of 4x4s and motorbikes on land she bought for the National Trust. In 1960, Alfred Wainwright, renowned author of many Lake District guide books, called this stretch of land "scenically one of the loveliest in Lakeland". About the Tilberthwaite route and a nearby bridleway he said that they were "happily unsuitable for cars. May they ever remain so."

Available evidence to date

In a 2019 LDNPA online survey many respondents stated how recreational motor vehicles using this route affected their relationship with the landscape. An independent assessment of responses by an environmental psychologist found different kinds of impact:

- Tranquillity and beauty diminished
- Stresses from city life introduced
- Connection with nature disrupted
- Cultural heritage threatened
- Physical danger from motor vehicles on narrow sections
- Feeling of apprehension before and while walking the route
- Harm caused to the landscape, flora and fauna

85% of survey respondents who do not use motor vehicles on this route wanted a Traffic Regulation Order to ban recreational motorised access.

The need for a Traffic Regulation Order

You will remember that in 2019 two ICOMOS technical reviews had already requested the introduction of Traffic Regulation Orders on the High Tilberthwaite and High Oxenfell routes, indicating that a number of criteria for the introduction of TROs apply here. Another ground from the relevant Road Traffic Regulation Act 1984 should be added: "avoiding danger to persons or other traffic using the road or any other road or for preventing the likelihood of any such danger arising." Many survey respondents have expressed their concern about physical safety in the presence of motor vehicles on this route, particularly on the narrow sections at both ends of the route.

The voice of local people

Given the importance of local participation for World Heritage Sites, it should also be noted that Little Langdale residents have formally asked for an end to recreational motorised access on the five green lanes in the area. Lakes Parish Council passed a resolution requesting a TRO on the Tilberthwaite route. In addition, the National Trust and local mountaineering clubs have requested a ban on motor vehicles on this route.

An unnecessary and irrelevant survey

It is unfortunate that the LDNPA, rather than responding to UNESCO's call to protect this area, is now launching a further survey. The questionnaire is not designed to address any of UNESCO's concerns, and displays a bias in favour of continued use of the route by recreational motor vehicles:

- The sample is limited to users who happen to be on the track on six different days between January and June 2024. It excludes all those who know the route but are not using it on those days. The survey does not have any regard for the national and international significance of the property. A petition asking for the closure of this and similar unsealed roads has now reached over 390,000 signatures.
- The survey mentions none of the attributes of OUV that are liable to be affected by motorised use: tranquillity, connection to this harmonious landscape, sense of remoteness and wildness.
- The survey states as indisputable fact that motor vehicles have a legal right to use the route, rather than making respondents aware that this is precisely the issue: should the National Park Authority use its powers to prohibit such use or not?
- The survey gives an average usage figure of 6 motor vehicles a day, without telling respondents that there are large variations between weekdays and weekends and between winter and summer months. Walkers, cyclists and horse riders are much more likely to use the track at weekends and during the summer, when usage by motor vehicles is also much higher and has in the past reached 50 a day.

The Tilberthwaite Partnership Management Group

Against the advice from ICOMOS in its October 2019 technical review, the LDNPA established a management group to "work collaboratively to monitor usage and condition; undertaking necessary activities to help mitigate any new issues that may arise." As the remit of this group was limited to maintenance and monitoring, no recommendation to limit motorised access could be made. The report of this group has now been delivered to the Rights of Way Committee. As expected it contains no proposals for a Traffic Regulation Order.

Protecting tranquillity

In its 2019 assessment report which classifies the Tilberthwaite route as 'mainly/partially tranquil' the LDNPA confirms that

tranquillity would be protected by a prohibition on recreational motor vehicles:

"14.8.4 The U5001 passes through areas with scores of 5,30,30,35,15 – and therefore can be classed as mainly / partially tranquil. It is not in the most tranquil zones of the National Park, but on the edge of it – it is in the transition zone between 'neutral' and 'most tranquil'."

The report also has this to say about the effect of a ban on motor vehicles:

"14.8.23 As mentioned above, it is beyond doubt that removing recreational MPV traffic from the roads would change the experience for those meeting the traffic whilst on the roads themselves."

14.8.28 It is undeniable that removing recreational MPV traffic from these roads will certainly remove noise from those meeting the MPVs on the road itself."

The protection of tranquillity and an increase in the wellbeing of visitors is one of the objectives specified in the Nomination Bid Volume (4, p. 242). To achieve both a reduction of noise on the route and an increase in the wellbeing of non-motorised users the Authority should now reconsider the need for a Traffic Regulation Order in this emblematic valley.

Conclusion

We are very concerned that the LDNPA sees this survey as a model to be used on other Lake District green lanes



Fig. 1: Other National Parks have made extensive use of their right to close unsealed roads to motor vehicles since 2006. Graph: Lake District Green Lanes Alliance

The only National Park in England that is also a World Heritage Site has closed no unsealed roads to motor vehicles since 2006, when National Parks were given powers to do so. Since then, the Peak District NP and the Yorkshire Dales NP between them have closed 17 routes by introducing Traffic Regulation Orders.

In its Nomination Dossier the LDNPA deployed a wealth of specialist expertise to describe in rich detail what makes each valley universally outstanding. There is now an urgent need for the Authority to use the same calibre of expert knowledge in a renewed effort to protect tangible and intangible attributes against this particularly damaging kind of motorised tourism.

Prosecco Hills: Deforestation and Earthworks Continue Even Five Years After Inscription

Gianluigi Salvador, Pesticide Action Network Italy



Veneto is the second Italian region for land consumption and unfortunately land continues to be consumed even within UNESCO World Heritage sites such as the Conegliano-Valdobbiadene Prosecco DOCG hills. Despite the numerous promises of regional institutions, the expansion of vineyards continues and now invades every territory previously dedicated to other agricultural crops and forests.

These deforestations go under the heading “Land development works for forestry reorganization and new vineyard planting” or “partial restoration of old vineyards”. Whatever the term “partial” means, the deforestation of the hills also has the authorization of the Superintendency for Environmental Heritage and the Forestry Services Organizational Unit.

Although this area is bound to UNESCO certification, there is no mention of the constraints dictated by the 14 UNESCO Recommendations (almost monitions). The promises of a block of

new plants, even if they are causing hundreds of landslides, are systematically disavowed and ridiculed by the facts with the authorization of earthworks and deforestation of entire hills (see Fig. 1 and 2).

In reality they respond to a plan based exclusively on profit. This devastation continues five years after the certification of



Fig. 1: Earth excavations and deforestation of the Refrontolo hills for new vineyards, 19 June 2023.

Photo: Gianluigi Salvador



Fig. 2: Earth excavations and deforestation of the Campea hill for new vineyards, 30 May 2021.

Photo: Gianluigi Salvador



Fig. 3: Earth excavations and deforestation in the Tarzo hills for new vineyards, 8 May 2024.

Photo: Comitato Marcia Stop Pesticidi



Fig. 4: Demonstration against pesticides and the expansion of vineyards in the Tarzo hills, 8 May 2024.

Photo: Comitato Marcia Stop Pesticidi

the Prosecco Hills which took place in Baku (Azerbaijan) on 7 July 2019 (see Fig. 3 and 4) while each year the Stop Pesticides March against the expansion of vineyards and the massive use of synthetic pesticides is repeated (see Fig. 5).

In fact, the citizens, with the certification of the site as a World Heritage Site, expected the Italian Government, delegated by UNESCO to manage the site through the Ministry of Culture, to



Fig. 5: March to stop pesticides, 1 May 2024. Photo: Comitato Marcia Stop Pesticidi

gradually implement the projects of the 14 recommendations and above all to involve or at least communicate to the population the progress of the improvement projects requested by ICOMOS in the document “2019/whc19-43com-inf8B1.Add”. Instead, nothing happened (see recommendation “m”).

Therefore there is no information on indicators relating to biodiversity (see recommendation “h”) which states: “Further develop the monitoring system by adding indicators for the assessment of the conservation status and biodiversity of the property”. Residents know very little about the current drastic decline in insects and birds in the area due to synthetic pesticides. Very little is known about the maintenance with mapping and inventories of vernacular constructions (see recommendation “b”) although the chapter “Protection and management requirements” regulates that: “the construction of new production areas and buildings in the agricultural area not strictly necessary for processing of agricultural land are not permitted”.

Indeed, just fifteen days after the UNESCO certification of the Prosecco Hills, a law on the “Albergo diffuso” was approved in the Veneto Regional Council, a law that allows action contrary to what is reported in the UNESCO recommendations. In fact, through an ad hoc amendment, article n.13 was inserted into an “omnibus” Regional Law n.29 of 25 July 2019. Article no. 13 of the law was inserted as article 44bis with the title: “Re-use of structures in an agricultural area for the purpose of tourist rental or for the purpose of classification as a widespread hotel annex”, within another regional law no.11 of 24 April 2004 “Regulations for the governance of the territory and regarding landscape”.

This new regulation as it is written, inserts, upon confirmation in the council chamber by the regional councilor Federico Caner, rules that concern the whole of Veneto, but it was designed for the Prosecco Conegliano-Valdobbiadene hills and requires the Regional Council to establish the list of interested municipalities¹. As confirmed by the regional councilor, it con-

cerns the transformation of chicken coops, tool sheds, stables, barns, hovels and garages existing in an agricultural area “for their use aimed at tourist rental or for purposes of classification as a branch of a widespread hotel”. These buildings will not be subject to the payment of the construction contribution and can be expanded up to 120 cubic meters, in derogation of the law on land consumption (Article n.13 - Comma 6).

Twelve municipalities are affected, covering approximately a thousand potential buildings on 10,000 hectares: a huge pour of concrete despite what the WH Committee declared in Baku²:

“Invite all State Parties to prioritize the effective protection, conservation and management of World Heritage properties situated on their territories in consistency with the “Policy Document for the integration of a sustainable development perspective into the processes of the World Heritage Convention”.

Equally serious for the control of the implementation of the 14 heavy ICOMOS recommendations was the elimination in Baku, on 7 July 2019, by the UNESCO World Heritage Committee, of the 15th recommendation with the decision “43 COM 8B.37”. In fact, the Committee, after having examined the two documents: the “WHC/19/43.COM/8B.Add” issued by the UNESCO WH Center in Paris and the document “WHC/19/43.COM/INF.8B1.Add” issued by the International Council on Monuments and Sites (ICOMOS) evaluation commission, has registered “The Hills of Prosecco of Conegliano and Valdobbiadene” as a World Cultural Heritage Site, inserting it as the 55th Italian UNESCO site, and this despite years of continuous protests by Italian citizens.

Having also eliminated the 15th recommendation which read: “Ensure that all major projects that could have an impact on the property are communicated to the Paris World Heritage Center in line with Article 172 of the Operational Guidelines for the implementation of the Convention of World Heritage” removes the responsibility of the Ministry of Culture towards UNESCO in Paris because it effectively prevents control of the times, costs and quality of the projects implementing the other 14 recommendations indicated by the ICOMOS UNESCO Commission and instead offers a great opportunity to those who want act undisturbed to deforest, excavate and build.

Within the UNESCO hills in 2018, after all the necessary signatures had been collected, an institutional consultative referendum was also promoted to discuss the elimination of synthetic pesticides within the territory of the city of Conegliano. Unfortunately, the referendum committee had to give up in the end as it lacked the economic means to counter legal opposition, promoted across the board by five rich private organizations that protected the economic interests of viticultural crops based on synthetic pesticides. The five large organizations

¹ Veneto Regional Councilor Andrea Zanoni, CS 22 July.2019: Approvata una norma “omnibus” che massacrerà ancora il Veneto.

² UNESCO WH Committee <https://whc.unesco.org/document/176361>



Fig. 6: March for a Conegliano municipal referendum to stop synthetic pesticides, 20 March 2019.

Photo: Gianluigi Salvador

were: three agricultural trade union associations (Confagricoltura, Coldiretti, CIA-Confederazione Italiana Agricoltura) and two viticultural consortia (DOC prosecco and DOCG prosecco Valdobbiadene-Conegliano).

It is therefore firmly reiterated that the Italian Ministry of Culture, through its UNESCO office responsible for “fulfilments re-

lated to the implementation of UNESCO Conventions and programs” make public the projects that implement the 14 UNESCO recommendations as they are presented in the following documents: – “2019/whc19-43com-inf8B1.Add” of ICOMOS International, – “2019/whc19-43com-8B-Add” of the WH Center UNESCO in Paris, – “2019/whc/19/43.com/18” of the UNESCO WH Committee.

Austria and Hungary Continue to Threaten the Fertő / Lake Neusiedl Cultural Landscape



Zoltan Kun, Friends of the Fertő Lake Association

The Fertő Lake is a transboundary UNESCO Cultural World Heritage site¹ that also protects important natural values and is also a UNESCO Man & Biosphere Reserve². Civil society organisations on both sides of the border call the Austrian and the Hungarian governments to stop their investment in new energy and tourism-related projects, which do not meet the guidelines set up in the WH site's existing management plan.

The two governments are planning at least three projects that threaten the identified Outstanding Universal Value of the Fertő / Neusiedlersee Cultural WH site:

- the construction of the wind farm “Neusiedl-Weiden Re-powering” in the immediate vicinity of the area;
- the building of a water replenishment canal, which would change the ecosystem of the lake through linking it to the Danube river;
- a large scale tourism development project at Sopron / Fertőrákos that would bring accommodation facilities inside the lake bed.

Threat 1: A Wind Farm near Neusiedl-Weiden

The Allianz für Nature civil society organisation submitted an appeal to the Austrian Federal Court in relation to annul the permission to the wind farm. The wind farm, which benefits from the European Union updated Renewable Energy Directive and the RePowerEU strategy, would cause significant visual disturbance in the landscape. While the UNESCO/ICOMOS Advisory Mission of 2023¹ has strongly criticized the project, the Federal Court unfortunately has refused a complaint filed by the Allianz für Nature, and didn't even allow an appeal. This has opened the way for the investor to proceed with the realization of the project (Fig. 1).

Threat 2: A water-replenishment canal

A new potential threat to the lake relates to its water supply. The lake has suffered from the impact of climate change and unsustainable agriculture practices in the past decade, and its water level reached a record low level by the end of 2022.



Fig. 1: The already existing wind park at the Neusiedlersee. Photo: Alliance for Nature

Therefore, the Hungarian government in cooperation with Burgenland, Austria is planning to build a new water channel from Mosoni-Danube to the Seewinkel area². This water replenishment scheme, which aims to direct water from the Danube river to the lake, has been designed by the two governments despite the lake having been faced with several drying out periods in the past few hundred years (the last dry out happened in 1868). This plan would not only cause significant problems in the Danube ecosystem, but would mean an ecological disaster for the steppe lake.



Fig. 2: A dried-out small salt water lake in the Seewinkel area left its salt exposed on the ground. Photo: Kramazik / Nationalpark Burgenland

1 <https://whc.unesco.org/document/1269>

2 <https://burgenland.orf.at/stories/3164579/>

According to the preliminary environmental impact assessment document, the Austrian request for irrigation water exists beyond the irrigation season, which indicates the possibility of steering water from the Danube to the lake.

Such an action is potentially very damaging to the ecosystem of Fertő lake / Neusiedlersee, hence does not fit into the requirements of the EU Water Framework Directive. The source of water would be the Szigetköz Natura 2000 site, which faces with significant water shortages on its own. Our organisations believe that other measures (eg. water retention, changing agriculture practice, re-wetting wetlands in Hanság) would rather be needed in order to respond to the water level challenges of Fertő lake / Neusiedlersee.

Threat 3: The Sopon / Fertőrákos tourism development

The suggested large scale tourism development aims at investing roughly 120 million EUR of public funds in tourism facilities which are not compatible with the Outstanding Universal Value of the property. While tourism use would be possible, this particular project is not considered as sustainable by its scale. The total area is 77 hectares (4% of the non-strictly protected area of the national park), of which the new artificial land surface would approximately be 13 hectares. Two project elements (the 4-star hotel and 26 apartment houses) are to be built inside the lakebed. These will significantly impact the future water management of the lake, because the interest of those running the facilities might be prioritised over ecological and environmental objectives in relation to the water level. In order to proceed with the megalomaniac project, the Hungarian government set up a 100% state-owned project development company, which closed the shoreline for any public access. In our view, the environmental and building permissions were provided unlawfully.



Fig. 3: Road block closing access to the lakeshore.

Photo: Tibor Tőreki

Several organisations have been criticising the investment. Here comes an incomplete list of key critiques:

- Due to the increasing development of Neusiedlersee in Austria and Hungary, Alliance For Nature appealed to UNESCO to add Neusiedlersee to the List of World Heritage in Danger

- Based on the assessment of ICOMOS, UNESCO WH Secretariat asked the Hungarian government in June 2021 to stop the investment
- The European Commission included its investigation about this project in an EU Pilot inventory against Hungary
- The department of Biological Studies of the Hungarian Academy of Sciences issued a statement in 17 December 2021³, which also called the Hungarian government to stop the construction and reconsider the plans. The academy considers the tourism development resulting in irreversible damage in the natural values of the lake.
- Greenpeace Hungary with the support of Friends of Fertő Lake Association started to litigate cases to withdraw the environmental permission of the project
- More than 25,000 citizens signed an online petition and asked the Hungarian government to stop the project



Fig. 4: The traditional reed-covered wooden houses on the lake shore, a defining feature of the cultural landscape and located in the core zone of the World Heritage, have all been totally destroyed in December 2020.

Photo: Tibor Tőreki

Despite of the widespread protests, construction started in 17 December 2020 with the aim of implementing water-management related works and demolishing every existing infrastructure including the iconic reed-roofed wooden houses. ICOMOS Hungarian National Committee criticised 3 elements of the project and requested the investment organisation and the main architectural planner to refine the plans in its report dated on February 2021. This was followed by an assessment of ICOMOS International, which criticised the length of shoreline used for the tourism development, the height of the new buildings and the likely increased traffic to be created on land, through the reed-beds and on the lake. Therefore, the UNESCO WH Secretariat after consultation with ICOMOS International called the Hungarian government to stop its investment.

Due to the current financial crisis the Hungarian government finally decided to put the tourism project on hold due to the lack of available funding. The result of public procurement for the construction works was announced as unsuccessful on 7 July 2022. Mr. János Lázár, the Hungarian minister responsible for investments and construction, sent a letter to the mayor of Sopron on 22 July 2022, which confirmed putting the tourism project on hold. We hope this means a completely new, and more transparent process of obtaining permissions.

Flawed State of Conservation Report

There are also irregularities in the 3-page summary of the State of Conservation report available on the UNESCO WHC website. This summary is misleading and provides several pieces of false information.

For instance, the document presents the development along the lake shore as a way to re-establish the region's bathing culture. However, most of the project elements (4 types of accommodation, eco-centre, indoor and outdoor sport complex) have nothing to do with bathing culture. None of the building resonates the traditional architectural style of the region and makes no utilization of an important local building material: the reed. Hence the new development does not fit into the traditional land use and the lake only serves as a "stage-set" for the development.

The summary document refers to the carefully carried out Environmental Impact Assessment and Natura 2000 assessment, but these are exactly the documents which are still under investigation by the European Commission's DG Environment (EC DG ENVI). Based on an official complaint submitted in January 2020, the EC DG ENVI requested the Hungarian state party to provide evidence that the project fits into the area specific conservation objectives. As the EC started an EU Pilot investigation, the responsible country administrative office finally initiated a partial environmental review of the project on 6 April 2022.



Fig. 5: A rendering of the marina of the planned tourism complex. Its design is fundamentally alien to the traditional architecture of the region. Image: SFTFN Zrt

Contrary to the summary document submitted by both state parties, the Austrian Minister of Climate and Environment, Ms Leonore Gewessler, called the Hungarian government in 3 August 2021 to (a) stop the building processes and (b) perform a transboundary environmental impact assessment.^{4 5} These requests were ignored by the Hungarian state party. The document also states that the "impacts on World Heritage values were assessed in a World Heritage Impact Assessment Documentation prepared in accordance with the ICOMOS Guidance on Heritage Impact Assessments for Cultural Heritage Properties." However, the Heritage Impact Assessment is not publicly available and it was certainly not part of process of changing

the local building regulation which is the fundamental basis of asking for building permissions⁶.

The document states that the Hungarian Ramsar Committee and the Hungarian National Committee of ICOMOS were consulted about the project. However, both of the consultations happened after the permissions were authorised. The meeting with the Hungarian Ramsar Committee happened in August 2019 while the environmental permission came into force in August 2018! The consultation with the Hungarian National Committee of ICOMOS, which resulted in ICOMOS calling for refining the plans, happened in November 2020, while the building permission came into force in June 2020! Therefore, these consultations with key stakeholders do not meet with the description of consultation described in the ICOMOS guideline of Heritage Impact Assessment (see point 2-2-4 in the guideline). Hence, even if there has been a Heritage Impact Assessment conducted, it was done improperly.

The UNESCO WH Secretariat organised a joint UNESCO, ICOMOS, RAMSAR visit to the WH site in October 2023. The Hungarian government promised to involve UNESCO in the planning process. However, the public procurement was opened for restarting the building processes of the large scale tourism development in October 24. The public procurement is based on a design that was finished in August. Hence the government's promise to involve UNESCO and ICOMOS in the planning process was false, and this evidence was submitted to the Secretariat.

Notes

- <https://whc.unesco.org/en/list/772>
- <https://unesdoc.unesco.org/ark:/48223/pf0000366363>
- <https://mta.hu/viii-osztaly/mi-is-fenyveti-hazank-es-az-emberiseg-jovojet-111959>
- <https://m.bvz.at/burgenland/politik/neusiedler-see-gruene-wollen-bei-grossprojekt-arbeitsgruppe-mit-ungarn-burgenland-grossprojekte-gruene-tourismus-ungarn-wasser-neusiedler-see-leonore-gewessler-grossprojekt-284222126>
- <https://twitter.com/lgewessler/status/1422587076491587586>
- <http://www.sopron.hu:81/share/s/auTdC-Z7TXaOo2JICsTHVw>

Disillusionment and Decay: Time Ticks Out for the World Heritage Convention in Ohrid

Daniel Scarry, Ohrid SOS

ОХРИД
SOS

Designated in 1979 and 1980 to become a mixed World Heritage Site in Macedonia, and extended to Albania in 2019, South East Europe's Natural and Cultural Heritage of the Ohrid Region consists of ancient Lake Ohrid, its oligotrophic waters, the many world-unique species that have persisted or evolved within them, surrounding mountains that are themselves home to a continentally outstanding range of flora and fauna, globally significant wetland habitats and archeological, artistic, architectural, religious and historical buildings and artefacts that have accumulated over several thousands of years of continuous human presence.

The precise criteria under which the Ohrid Region has been proclaimed as World Heritage are, however, irrelevant. On the one hand, they contain significant blind-spots, and, on the other, the practical framework of the World Heritage Convention has proven seriously defective in terms of fully understanding, recognizing and protecting natural values in particular. Indeed, the Convention may even have become a distraction to civil society organizations that are dedicated to the protection of flora, fauna and cultural specificities, leading them to waste time and resources on processes that are ultimately futile.

The deterioration of the Ohrid Region has been documented profusely, including in several previous iterations of the annual World Heritage Watch Report.¹ Even to the uneducated eye, it is visible through the massive extirpation and continued incremental destruction of a vital wetland known as Studenchtishte Marsh;² the conversion of the Old Town of Ohrid into modern houses that poorly ape the authentic Ottoman style of the past; a decrepit and partial wastewater system that has been permitted for decades to transport filth and urban run-off into some of the world's most precious waters;³ the shrinking and pollution of Lake Prespa, source for approximately 25% of Lake Ohrid's inflow;⁴ ominous algal growth;⁵ the transformation of a fount of speciation at the Springs of Saint Naum into a partially illegal, nature-harming restaurant, amid a proliferation of tourism facilities⁶ that encourage the trampling to death of a critically endangered species;⁷ and the ruthless concreting of Lake Ohrid's shore and hinterland, both legally and illegally, including inside the boundaries of National Park Galichica. Then, there are the less visible changes: the internal corrosion of ichthyofauna;⁸ the collapse of bird populations;⁹ the presence of *Escherichia coli* in supposedly pristine locations;¹⁰ and the suspected push of unique salmonid fish to the point of no return.¹¹

An illustrative overview of challenges facing the Ohrid Region

All photos by Ohrid SOS except where noted.



Fig. 1: One of the illegal lakeshore bar-cafes at Studenchtishte Marsh reopens for business in 2023. Under Recommendation 2h of UNESCO's 2020 Reactive Monitoring Mission, seasonal tourism facilities should be removed from the area. (Ohrid SOS, Jul. 23, 2023)



Fig. 2: Illegal houses approach completion inside the area that is proposed to be designated as the Studenchtishte Marsh Nature Park and supposedly under comprehensive temporary protection until then. The law for the area will not prevent future legal construction. (Ohrid SOS, Sep. 3, 2023)



Fig. 3: A quad bike, which has been driven along the waterfront excluded from a proposed Nature Park at Studenchishte Marsh, sits in-lake alongside a jet-ski where bars occupy the lakeshore, three nature disturbances that have been identified for years. (Ohrid SOS, Sep. 23, 2023)



Fig. 4: Filthy water continues to enter Lake Ohrid at Mazija, a micro-hotspot of biodiversity that has been identified by the Management Plan for the Natural and Cultural Heritage of the Ohrid Region 2020-2029 yet excluded from the Studenchishte Marsh Nature Park. (Ohrid SOS, Sep. 23, 2023)



Fig. 5: Visibly defective sewerage infrastructure near the Saint Sophia church in Ohrid leaks into the world's most species rich lake in terms of endemic taxa to surface area. (Ohrid SOS, Aug. 16, 2023)



Fig. 6: An illegal shed-like structure with overturned trash container and vehicles, some of the "features" inside the soon-to-be designated Studenchishte Marsh Nature Park, which, according to the Republic of Macedonia's 2023 State of Conservation Report, is currently under strict temporary protection. It belongs to a lakeshore bar. (Ohrid SOS, Sep. 23, 2023)



Fig. 7: Construction waste amasses in the abused habitats close to Lake Ohrid's east coast, an epicenter of tourism development. (Ohrid SOS, Sep. 3, 2023)



Fig. 8: A hotel inside Lake Ohrid's protected 50m shore-zone at the village of Lagadin, which UNESCO requested to be demolished in Recommendation 2d(v) of its 2020 Reactive Monitoring Mission, proceeds to completion having achieved legal status. (Ohrid SOS, Aug. 18, 2023)

In 2017¹² and 2020¹³, the World Heritage Center together with the IUCN and ICOMOS conducted site visits to the Ohrid Region under the guise of Reactive Monitoring Missions, which came up with numerous recommendations relating to these issues and more. As demonstrated by the photographs that accompany this text, many have simply been ignored. Despite this, threats in World Heritage Committee Decisions 43 COM 7B.36 (2019) and 44 COM 7B.77 (2021) to place the Ohrid Region on the List of World Heritage in Danger have not been carried out.

On the contrary, Decision 45 COM 7B.104 from 2023 again failed to take action. However, this year was different in that, while, previously, the World Heritage Centre's draft versions contained provisions for a World Heritage in Danger listing that were later overwritten by the World Heritage Committee,¹⁴ no likewise attempt was made this time whatsoever. Indeed, the draft that was passed by the latter without discussion even contains provisions that allow the Republic of Macedonia to con-



Fig. 9: Public Enterprise National Park Galichica continues to advertise off-road activities at its promotional booth in Ohrid town center, despite admitting their harmful effect and contract infringement by one ATV contractor. (Ohrid SOS, Jul. 9, 2023)

Fig. 10: Approved minor reconstruction of an early 20th century building of historical significance just 200m from Ohrid City Hall results in its total demolition despite established illegality. (1. Google Jun, 2015; 2. & 3. Ohrid SOS Sep. 13, 2023; 4. Ohrid SOS Jan. 9, 2024)

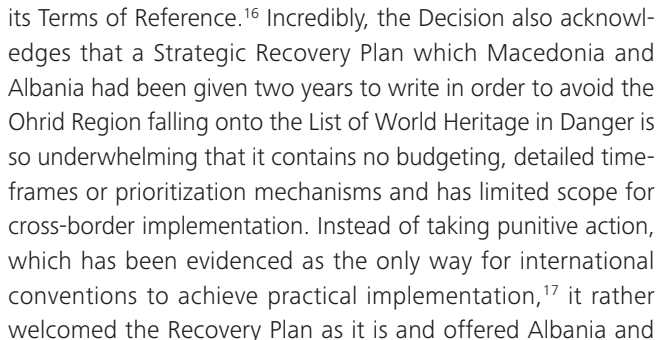
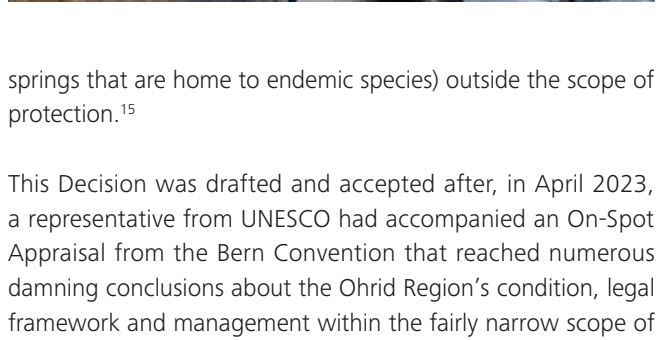


Fig. 11: At the site where an illegal lakeshore cafe was removed 3 years ago in the village of Kaneo to the west of Ohrid, the lakeshore is infilled with rocks next to an illegal wall instead of returning the coast to its natural state (photographer identity withheld, Sep. 2023)



Fig. 12: At the same Kaneo location, the wall is illegally expanded to enclose more of the shore in preparation for next summer season (Ohrid SOS, Jan, 2024)

tinue with the proclamation of an obviously defective Nature Park at the aforementioned Studenchishte Marsh without revision, leaving 90% of the area open to exploitation and several of its most important features (a modified river, the lakeshore and

springs that are home to endemic species) outside the scope of protection.¹⁵

This Decision was drafted and accepted after, in April 2023, a representative from UNESCO had accompanied an On-Spot Appraisal from the Bern Convention that reached numerous damning conclusions about the Ohrid Region’s condition, legal framework and management within the fairly narrow scope of its Terms of Reference.¹⁶ Incredibly, the Decision also acknowledges that a Strategic Recovery Plan which Macedonia and Albania had been given two years to write in order to avoid the Ohrid Region falling onto the List of World Heritage in Danger is so underwhelming that it contains no budgeting, detailed time-frames or prioritization mechanisms and has limited scope for cross-border implementation. Instead of taking punitive action, which has been evidenced as the only way for international conventions to achieve practical implementation,¹⁷ it rather welcomed the Recovery Plan as it is and offered Albania and Macedonia more time to make a new one. Meanwhile, increasing numbers of Ohrid Region plants and animals will presumably die unmonitored.

In consequence, Ohrid SOS, the most active and influential civil society organization in the Ohrid Region, is now appraising whether to continue its contribution to the UNESCO process. It is disillusioned with the World Heritage Committee, which it considers to be a largely opaque and unaccountable body that has limited grasp of cultural, ecological and environmental issues, producing conclusions for diplomatic and political reasons that are not in the best interests of World Heritage Sites. It

also evaluates that the hosting of charade Sessions in countries where freedom of expression is anything but guaranteed, during which the non-government community has a mere one-minute slot to speak after Decisions have already been passed, is a poor justification for the emission of travel-based greenhouse gasses.

Moreover, interaction between Ohrid SOS and the UNESCO Secretariat and its Advisory Bodies seems to be regressing. Despite submitting a 340-page report replete with evidence of planned and actual heritage destruction¹⁸ to the World Heritage Centre, ICOMOS and the IUCN in April 2023, Ohrid SOS did not even receive confirmation of receipt, leave alone follow-up communication. Indeed, the organization's work is not adequately reflected in the precis titled *Analysis and Conclusion by World Heritage Centre and the Advisory Bodies in 2023* that accompanied draft Decision 45 COM 7B.104 despite its clear relevance, an oversight that has led to reduced pressure for progress on Macedonia and Albania. This matches the previous two years at the World Heritage Watch Forum, where Ohrid SOS presentations to the World Heritage Centre, ICOMOS and the IUCN have largely met with silence.

Other matters are just as serious: Time and again Ohrid SOS has warned that substandard environmental assessments are endangering Ohrid Region habitats, a conclusion which is backed up by reports from the UNECE,¹⁹ European Commission²⁰ and aforementioned On-Spot Appraisal,²¹ yet it habitually receives the response that UNESCO's Advisory Bodies and Secretariat do not have time to look into them. Such absence of interest and auditing for a critical social and environmental failsafe leaves heritage open to all kinds of invasion. Similarly, as a contributor to the World Heritage Watch's Potsdam Papers,²² which offer comprehensive advice for reform of the functioning of the World Heritage Convention, Ohrid SOS was shocked to learn that, since their completion in 2022, the World Heritage Centre has not engaged World Heritage Watch in any related follow-up.

In total, these experiences and observations indicate a lack of respect for civil society and its crucial heritage-focused efforts. They also imply that UNESCO World Heritage is a deficient forum for the furtherance of protection for flora, fauna and human culture.

Recommendations

The reader is referred to the above-mentioned Potsdam Papers²³ for a fuller exploration of changes that are necessary to improve the World Heritage Convention's practical implementation. Here it suffices to say that the World Heritage Committee should be populated with experts in the fields of nature and culture, taking decisions on the basis of relevant scientific and other evidence, not diplomats working for political ends; civil society must have a guaranteed right and sufficient time to speak before World Heritage Committee Decisions are adopted; a thorough auditing system for impact assessments should be urgently designed,

appropriately staffed and deployed forthwith; and communication between the World Heritage Centre, its Advisory Bodies and civil society must increase and improve.

Notes

- 1 See the World Heritage Watch reports from 2017 to 2023 inclusive.
- 2 Apostolova et al. (2022) Studenchtishte Wetland on the shores of Ohrid Lake, Republic of North Macedonia. In: Wetlands and People at Risk. IUCN, Gland, Switzerland.
- 3 Ohrid SOS (2023) World Heritage on the Edge V: Vanished Past, Receding Future.
- 4 Soria and Apostolova (2022) Decrease in the Water Level of Lake Prespa (North Macedonia) Studied by Remote Sensing Methodology: Relation with Hydrology and Agriculture. Hydrology, Volume 9, Issue 6
- 5 National Park Galichica (2022) Special Plan for the Management of the Saint Naum Complex (working version). National Park Galichica, Municipality of Ohrid, Republic of Macedonia.
- 6 Sovinc, A. (2023) Alleged negative impacts to Lake Ohrid and Galichica National Park candidate Emerald sites due to infrastructure and urbanization developments (North Macedonia). On-Spot Appraisal. Convention on the Conservation of European Wildlife and Natural Habitats. Strasbourg, France.
- 7 Matevski, V. (2019) Angelica palustris. The National Red List of North Macedonia. Ministry of Environment and Physical Planning, Skopje, Republic of Macedonia.
- 8 Velkova-Jordanoska, L. (2022) Ecological screening on health condition of fish population in Lake Ohrid (R. North Macedonia), through histopathological biomarkers. 18th World Lake Conference: Governance, Resilience and Sustainability of Lakes for a Better Society. Universidad de Guanajuato, Mexico City.
- 9 IUCN (2017) World Heritage Outlook: Lake Ohrid. Gland, Switzerland.
- 10 Results from a June 2022 test of water from the Springs of Saint Naum by Centre for Public Health—Ohrid.
- 11 Monetti, M. et al. (2020) Lake Ohrid Watershed Management Plan. Global Watershed Partnership, Athens, Greece.
- 12 ICOMOS, IUCN and the World Heritage Centre (2017) Report from the 9 – 14 April 2017 Reactive Monitoring Mission to the Natural and Cultural Heritage of the Ohrid Region. Maison de l'UNESCO, Paris, France.
- 13 ICOMOS, IUCN and the World Heritage Centre (2020) Report from the 27 - 31 January 2020 Reactive Monitoring Mission to the Natural and Cultural Heritage of the Ohrid Region. Maison de l'UNESCO, Paris, France.
- 14 Compare the draft and adopted Decisions 44 COM 7B.77 and 43 COM 7B.36.
- 15 Ohrid SOS (2022) Everything is Dead (and Other Lame Excuses).
- 16 Sovinc, A. (2023) Alleged negative impacts to Lake Ohrid and Galichica National Park candidate Emerald sites due to infrastructure and urbanization developments (North Macedonia). On-Spot Appraisal. Convention on the Conservation of European Wildlife and Natural Habitats. Strasbourg, France.
- 17 Hoffmann, S. J. et al. (2022) International treaties have mostly failed to produce their intended effects. Proceedings of the National Academy of Sciences, 119 (32).
- 18 Ohrid SOS (2023) World Heritage on the Edge V: Vanished Past, Receding Future.
- 19 United Nations Economic Commission for Europe (2019) 3rd Environmental Performance Review of North Macedonia. Geneva, Switzerland.
- 20 European Commission (2023) North Macedonia Report 2023. Brussels, Belgium.
- 21 Sovinc, A. (2023) Alleged negative impacts to Lake Ohrid and Galichica National Park candidate Emerald sites due to infrastructure and urbanization developments (North Macedonia). On-Spot Appraisal. Convention on the Conservation of European Wildlife and Natural Habitats. Strasbourg, France and Standing Committee of the Bern Convention (2021) Recommendation No. 211. Adopted December 3, 2021.
- 22 World Heritage Watch (2022) The Potsdam Papers: A Reform Agenda for the World Heritage Convention on Occasion of its 50th Anniversary. Published by ARGUS Potsdam e.V. and World Heritage Watch Potsdam and Berlin.
- 23 Ibid

Diyarbakır Fortress and Hevsel Gardens Cultural Landscape Monitoring and Evaluation Report

Nevin Soyukaya, Samet Uçaman, Ferit Kahraman, Pınar Can, Mahmut Özkeskin, Zeki Kanay and Jıyan Aydın for the Diyarbakır City Protection Platform (DCPP)

Non-governmental organizations in Diyarbakır had identified and documented in a report that the historical city of Suriçi, where and around the World Heritage Site of Diyarbakır Walls, and Hevsel Gardens, the fortress, Anzele Water Spring and Tigris Bridge are located, was subjected to urbanicide practices. Suriçi's physical fabric was demolished and destroyed, around 24,000 people, who are the bearers of the local culture residing in the area, were forcibly displaced and the area was dehumanised, the traditional life and production chains were destroyed, and the social memory was lost. The UNESCO Reactive Monitoring Mission's visit to Diyarbakır in December 2022 and their report confirmed the site's destruction, which was also reflected in the UNESCO World Heritage Centre's (WHC) decision at its 45th Session in Riyadh in October 2023.

This report focuses on the findings of systematic monitoring and reporting activities carried out in the area by the DCPP-World Heritage Site Monitoring and Evaluation Commission, which was founded by NGOs in Diyarbakır following the UNESCO-WHC decision.

World Heritage City Walls

It has been observed that the asphalt road constructed for the Millet Garden by the Provincial Directorate of Environment and Urbanization, which extends between İçkale and Yenikapı adjacent to the outer face of the eastern part of the city walls, continues causing excessive vehicle traffic (Fig. 1). No measures have been taken to address this issue.

Furthermore, the urban landscaping of the Millet Garden also damages the rural landscape integrated with the Hevsel Gardens on the eastern side of the city walls. Likewise, it is observed that the reinforced concrete road and iron railings built on the rock adjacent to the city wall beginning with the Keçi Bastion and continuing until the bastion numbered 55 increase pedestrian traffic at the base of the city wall and damage the landscape of the city wall and the relation between the rocky ground and the city wall (Fig. 2).

- Unlicensed cafes along the eastern city walls are causing damage through unconscious use of people (Fig. 3).
- Again, it has been seen that the outer city walls surrounding the main city walls from the outside, starting from the Keçi

Bastion under the eastern city walls and continuing along the eastern city walls, were not protected and left to destruction. The area marked in red is the remains of the outer city wall (Fig. 4).

- Official entities related to cultural asset protection such as the Ministry of Culture and Tourism, governorship, municipalities, and political parties use the city walls for advertising and announcements. Hanging enormous banners and posters on the city walls causes physical harm and reduce their visual appeal (Fig. 5). At the same time, it also lowers public awareness of conservation and environmental issues.

Historic Quarter of Suriçi

- It is observed that the new buildings constructed in Suriçi's demolished neighbourhoods following the conflicts are not given to the displaced inhabitants but to the pro-government NGOs and religious foundations with functions such as Quran courses, or social facilities such as the Judge's House, Police House, and schools for the use of district governorships and police stations (Fig. 6-8).
- Furthermore, after the earthquake on February 6, 2023, some of the citizens who lost their houses and are unable to find rental housing, settled in this area with exorbitant rents.
- Despite this, there are a large number of vacant houses and shops built for commercial functions, and since these buildings are not being used, they have been abandoned for demolition and have become dilapidated, and there are many houses that are advertised for sale or rent because they cannot be used (Fig. 9–10).

It has been observed that life has essentially ended within the historical city walls that have existed for thousands of years. The residential use of the once-thriving district has been transformed in favour of a commercial and formal institutional zone. Because it no longer serves an urban function and is primarily a business place, it is used during the day but abandoned at night. Therefore, the neighbourhood's population differs during the day and at night. In order to re-establish urban life in Suriçi, where urbanicide was practiced, and to heal the social wounds inflicted on the city, we believe that it is necessary to relocate those who were forcibly displaced after the conflicts to newly constructed buildings.

- In addition, it has been observed that inhabitants residing in other neighbourhoods where the traditional texture remains dominant, particularly in the Lalebey neighbourhood bordering the demolished Alipaşa neighbourhood, have sought their own solutions and left their homes in fear of becoming victims of the future urban transformation process, as their neighbours recently experienced (Fig. 11–12).

Moreover, it has also been seen that after the earthquake of 6 February in various neighbourhoods of Suriçi, especially multi-storey reinforced concrete flats were evacuated due to damage. As a result, the number of evacuated empty flats has increased, and they gradually become dilapidated. These damaged reinforced concrete flats pose a danger. In addition, these abandoned structures are used by substance addicts and for criminal purposes. The usage of these buildings for criminal activities caused concern among the residents of these neighbourhoods, and as a result, migration has increased.

Since the ministerial decision on the implementation of urban transformation in the entire Suriçi is still valid today, the risk of urban transformation projects in the remaining areas continues. It has been observed that the authorities' failure to address the aforementioned issues in Suriçi's traditional neighbourhoods where urban transformation has not yet been implemented, lays the groundwork for urban transformation to take place in these areas.

We believe that in neighbourhoods where urban transformation is not implemented, it is imperative that the relevant institutions and organisations take the necessary physical and social measures against the dilapidation and criminal environment. In order not to repeat the same mistakes in the demolished neighbourhoods, it is imperative to support financially and technically the rights-holders to restore their registered empty buildings in the area and to ensure resettle the right holders in their own houses; to rebuild the unregistered buildings in accordance with their cultural and historical texture together with their rights-holders, and to ensure that the rights-holders live in their houses in order to revive the social fabric with the bearers of culture.

- No information has been obtained on the decision whether the project to implement urban transformation around the Anzele Water Spring, a component of the World Heritage Site, has been cancelled or not, which was also stated in the Reactive Monitoring Mission report and the World Heritage Centre decision. None of the projects on Suriçi is carried out transparently by the local or central government under the trustee administration and the city components are not informed.

Hevsel Gardens, Tigris Valley, On gözlü Bridge and its surroundings

- On the banks of the Tigris River at the continuation of the Hevsel Gardens, citizens have been gaining land by filling and destroying the riverbed (Fig. 13).
- That the Hevsel Gardens and the banks of the Tigris River are polluted with garbage and earthwork waste, plastic-coated cables are burnt in this area for their cables, the World Heritage site has currently been transformed into a garbage dump, construction and chemical waste area, and commercial enterprises such as cafeterias are located on areas filled with waste and earthwork (Fig. 14).
- That trees were cut down uncontrollably in the buffer zone on the Dicle University side of the Tigris River and were removed from the area with tractors (Fig. 15).
- Sewerage lagoons burst in the university area, the waste ponds of the university were destroyed and overflowed due to lack of maintenance and the overflowing wastewater contaminates the ecosystem and river (Fig. 16).
- The UNESCO WHC report also had highlighted ongoing unauthorized constructions and activities along both banks of the Tigris Bridge, within the Hevsel Gardens area and its periphery, and along the banks of the Tigris River. Existing structures in these areas have not been removed, while new constructions have been added. Additionally, portable businesses have been spotted on the bridge itself (Fig. 17–18).

Photographic Documentation
All photos © DKVD Diyarbakır City Archive



Fig. 1: Vehicle traffic at the foot of the city wall



Fig. 2: Iron railing at the foot of the city wall



Fig. 3: Unauthorized cafes at the foot of the city walls



Fig. 4: Remains of the outer wall



Fig. 5: Advertising billboard on the city walls



Fig. 9–10: Newly constructed buildings that have turned derelict due to disuse



Fig. 6–8: Commercial and governmental use of newly built houses



Fig. 11-12: Empty, neglected houses abandoned to demolition in the neighborhoods that maintain their authenticity



Fig. 13: Land acquisition through riverbank filling



Fig. 14: Dumping earthmoving in Hevsel Gardens



Fig. 15: Tree felling on the Tigris bank in the Dicle University area



Fig. 16: Openly flowing sewage on the banks of the Tigris River in the Dicle University area



Fig. 17–18: Intense illegal construction surrounding the Tigris Bridge.



Construction of Illegal Israeli Outpost Damages the WHS of Battir

עמק שווה
عمق شبیه
Emek Shaveh

Alon Arad, Emek Shaveh

On Sunday 24.12.23 a new Israeli illegal settler outpost was established¹ in the core area of the World Heritage Site of Land of Olives and Vines – Cultural Landscape of Southern Jerusalem, Battir (Ref. 1492)². The site, inscribed in 2014 as a WHS in Palestine, and WHS in Danger, retained its status by decision 45COM 8C.2 following the recommendation by the state party, the World Heritage Centre, ICOMOS and ICCROM (WHC/23/45.COM/7A.Add.4)³.

Battir is a village southwest of Jerusalem, six kilometers west of Bethlehem in the West Bank. Like many other Palestinian villages and towns in the West Bank, following the 1995 Interim Agreement (Oslo II)⁴ between Israel and the Palestinians, the residential area of the village was designated as area B while most of its agricultural lands were designated as area C. The implica-

tion of these categories is that while within the village itself civil governance (including the safeguarding of heritage sites) is the responsibility of the Palestinian Authority, the area is also under the auspices of the Israeli Defense forces (IDF) which retains responsibility for the security of the area. Moreover, sections of the WHS (those categorized as Area C) are under the civil auspices of the Israeli Civil Administration (ICA). This has resulted in a unique situation whereby the site is listed under the state party of Palestine, but in reality, the state party has control only over certain sections of the WHP (those which are designated as area B) and its governance is significantly limited in other parts of the property (those which are designated as area C). In those areas, and due to the Israeli military occupation, the State of Palestine is limited in its ability to prevent damage or oversee corrective measures to achieve a DSOCR.

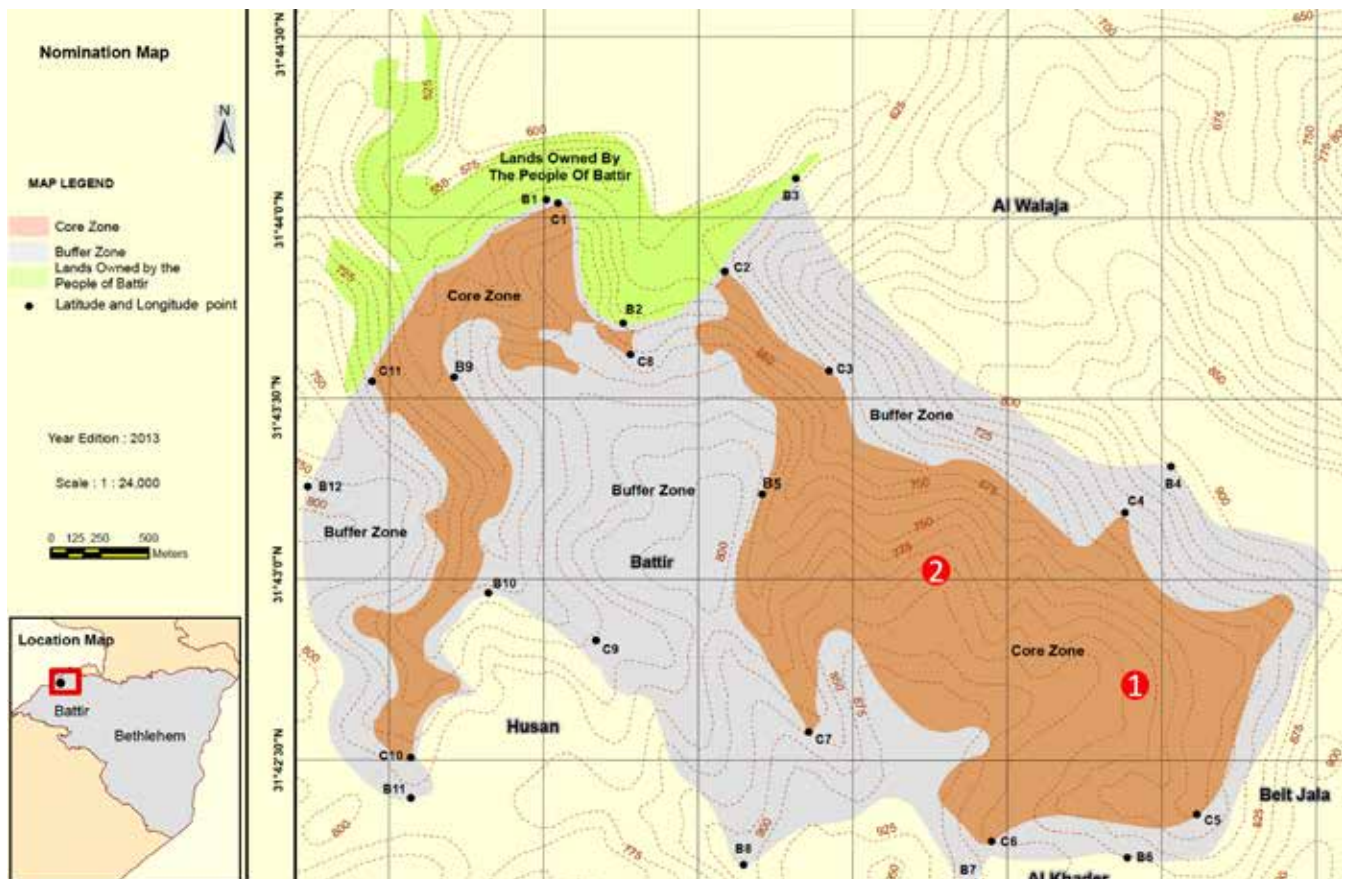


Fig. 1: Map of the site and the location of Israeli outposts. 1. Makhrouf outpost. 2. The new outpost.

Source of original map: UNESCO



Fig. 2: The site of the new outpost and location of damages documented by Emek Shaveh.

Sources: aerial photos: GovMap. Drone photo: Emek Shaveh

The Palestinian Authority’s Ministry of Tourism and Antiquities (MoTA) and local community stakeholders are therefore often powerless vis-a-vis threats to the WHP initiated by the ICA and Israeli settlers. In its 2023 SOC report, for example, the state party notes that this situation hinders farmers from restoring damaged terraces and maintaining the watchtowers⁵.

The latest outpost (see Fig. 2), which we have been monitoring, is situated approximately 500 meters from the edge of the village of Battir. It has been established in the exact same site twice before: in December 2018 and March 2022 but subsequently dismantled⁶ within a few days. This time, however, under the cover of war, the outpost has not only remained in place, but heavy machinery has been documented leveling the ground around it, and the development of the site is progressing at an alarming speed.

Battir’s agricultural terraces, some still in use, overlook deep valleys. A complex irrigation system fed by a network of water sources which has utilized the terraces and valleys for farming since antiquity have created a unique ecological and cultural

landscape. On UNESCO’s page in the section devoted to the site’s OUV, it is noted that among the factors contributing to the inscription of the area as a WHS is “the dry-stone architecture” which represents an “outstanding example⁷ of a landscape that illustrates the development of human settlements near water sources and the adaptation of the land for agriculture [...] The agricultural practices that were used to create this living landscape embody one of the oldest farming methods known to humankind and are an important source of livelihood for local communities.” Battir is one of the four sites inscribed for the State of Palestine.

Once declared a World Heritage Site in 2014, Battir was also included on the list of World Heritage Sites in Danger in a rapid procedure designed to bestow protection to the area which was threatened⁸ at the time by Israel’s plan to build a section of the separation barrier through the terraced landscape. Following the inscription, in early 2015, Israel’s High Court of Justice ruled⁹ to prevent the construction of the separation wall through Battir’s terraces.

However, subsequent threats to the WHP such as illegal construction of settlements on surrounding hills” which “is negatively affecting the visual and ecological quality of the landscape”¹⁰ have informed repeated requests by the State of Palestine to maintain the property on the list of World Heritage Sites in Danger.

Significant threats to the integrity and authenticity of the property continue to loom large including a road built in the eastern part of the WHP (2019), which is an expansion of a settler bypass road 60, as well as a plan to expand the Har Gilo settlement into the declared buffer zone of the WHP (Plan 401-4-1)¹¹. The recent State of Palestine’s SOC report lists the threats to the integrity of the property resulting from the geopolitical reality.¹² The above-mentioned outpost is the latest in a series of threats to the authenticity and integrity of the WHP (detailed on page 12 of the latest SoC report (2023) published by MoTA, see above), which are a function of the geopolitical context in which the site is situated. In the SoC the outpost is referred to as a “settler incursion in Ain Bardamo”¹³ and assessed at least 23 dunams, which may have increased at the time of writing this report.

This outpost is an illegal entity even according to Israeli law as it was built without a permit. Checks made regarding the ownership status showed that a large portion of the land on which the new outpost is situated was unilaterally designated by Israel as “state land”¹⁴ although there are Palestinians in Battir who claim to own the land. With respect to the plots titled the “residential area” and a section of the “flattened area” the ICA had issued an eviction order (“removal of invaders”) to the Palestinians, turning the illegal outpost’s settlers into a de-facto enforcer for the ICA. The fact that the outpost has not been dismantled, and in fact is being expanded – as bulldozers have been working on an access road and leveling the area around, uprooting olive trees - is in keeping with the lack of enforcement in the wake of increased illegal settler activities and violence throughout the West Bank since the war in Gaza began¹⁵. Despite complaints filed by human rights groups (such as Yesh Din), Israeli soldiers have been placed to guard the outpost. It is therefore clear that the ongoing development of the outpost is conducted with the knowledge and silent approval of the ICA, and perhaps even with its support.

The recent settler outpost joins another outpost set up in 2019, in an area called Makhrou, also inside the core zone of the WHS (also mentioned in the SoC report on page 11) and the above-mentioned bypass tunnel road (also page 11).

Emek Shaveh has been monitoring the damage to the site caused due to rapid and aggressive development. Access to the site is currently severely restricted (as the main entrance to Battir has been recently blocked), yet we were able to approach the site on January 31st 2024 and document the damage to the property:

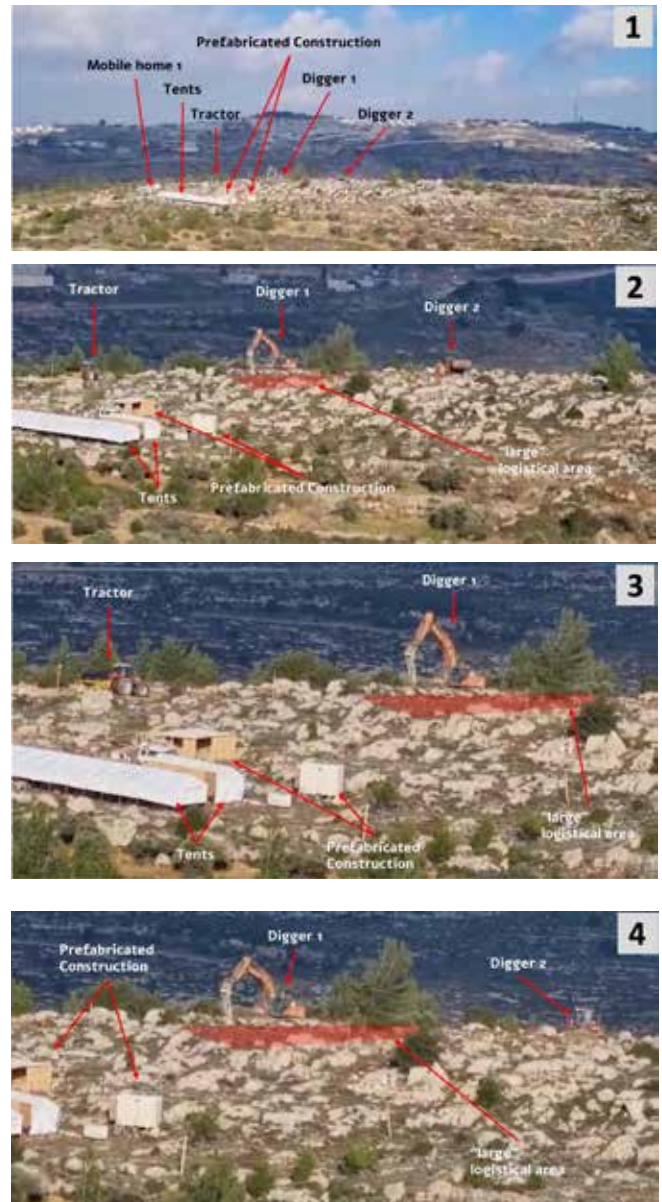


Fig. 3: Screenshots from a video documenting the work on the site. “Digger 1” looks like is working on the “Small” logistical area (number 5 in Fig. 2). “Digger 2” looks like is paving the north-south road (number 7 in Fig. 2). Source: Emek Shaveh

1. Construction – Two tents were established at the core development of the outpost. Construction is dated to late December 2023. The “large” tent is approximately 35 meters long. In addition, 2 prefabricated buildings were established (Fig. 4.4).
2. “Residential” area - Three mobile homes were parked in an area which had been cleared and flattened (Fig. 4–5).
3. Damage to a terraced wall - During works on renovating the access road (which was originally paved some time between 2018–2019), the settlers damaged a few terraces. Only one location could be documented by Emek Shaveh.
4. Road construction - Using heavy machinery the settlers paved a road (East-West) linking the access road with the “residential” area (marked 2), and “flattened area” (marked as 8), (Fig. 5.1–5.2).

- 5. "Small" logistical area – An area of about 290 sqm was flattened and leveled for logistical purposes, as the parked small digger suggests (Fig. 6.2).
- 6. "Large" logistical area – An area of about 600 sqm was flattened and leveled for logistical purposes, as the parked tractor, construction equipment (covered with white sheets), water container and trolley with wooden panels indicate (Fig. 6.1).
- 7. Road construction – a north-south axis road was paved with heavy machinery while damaging natural and archaeological surface (Fig. 5.3 –5.4).

- 8. "Flattened area" – As of the first week of February 2024, an area of about 5300 sqm (5.3 Dunam) was flattened since the establishment of the new illegal outpost in December. Testimonies provided by Battir residents to Emek Shaveh along with aerial and drone photos strongly suggest that approximately 17 terraced walls were destroyed and at least 5 others were damaged in the process. In addition, this action also included the uprooting of some 10 trees. (Fig. 7 - 8). Work conducted in this area during the month of February suggest that this area has since expanded.

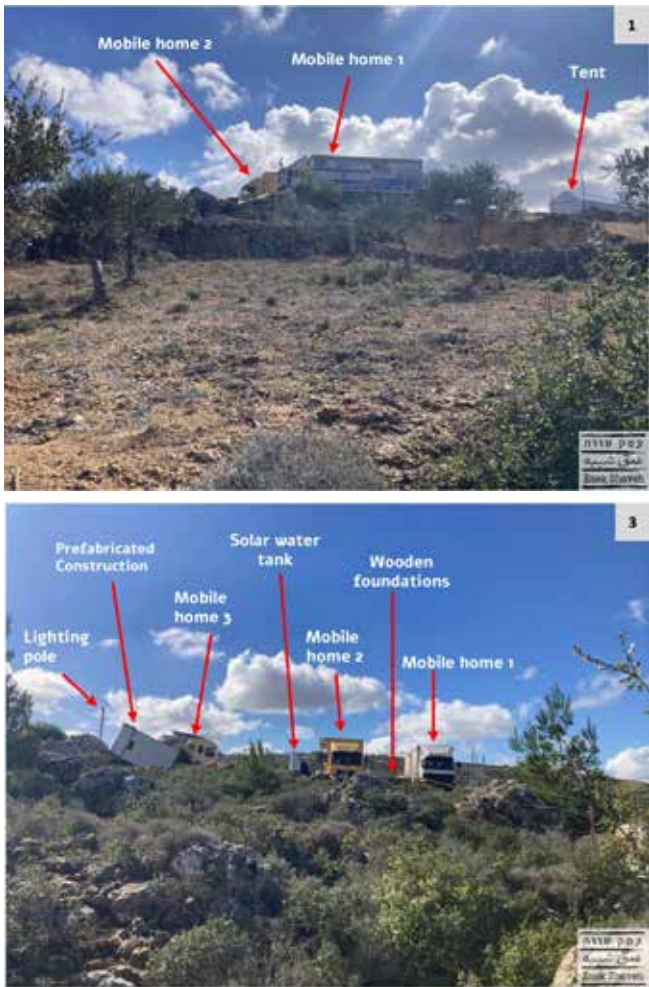


Fig. 4: The "residential" area illegal development (numbers 1-2 in Fig. 2).



Source: Emek Shaveh

Conclusion

The current situation whereby the State of Israel does not allow the state party of Palestine, which is in charge of the site’s conservation, independent and continuous access to the whole of the WHP, while at the same time enabling the establishment of two illegal outposts, places the integrity and authenticity of the site in real danger. As summarized in the conclusion of the SoC report, despite measures taken by the State party and stakeholders to safeguard the site’s OUV, the major threats to the property stem from the infrastructure projects initiated by Israel and the new settlement outposts. In response to this development,

Emek Shaveh calls on the World Heritage Committee members to remind Israel of its obligation to enforce the law and dismantle the illegal outpost. Secondly, to demand that Israel allow the state party of Palestine and local stakeholders to inspect the damage, take steps to rehabilitate the destruction and exercise continuous oversight over the WHS. Also, Emek Shaveh would like to call on the member states of UNESCO’s Executive Board and its General Assembly to demand that Israel uphold international law and ethics in general and particularly those conventions that pertain to the preservation of cultural property during warfare and in areas subject to a military occupation.



Fig. 5: The roads paved and the damage to the site. 1. Looking west on road 4. 2. Looking south at the intersection between 4 and 7. 3. Looking north at road 7, also visible is the northern access to the "flattened area". 4. Looking south at road 7. Road numbers as in Fig. 2.

Source: Emek Shaveh

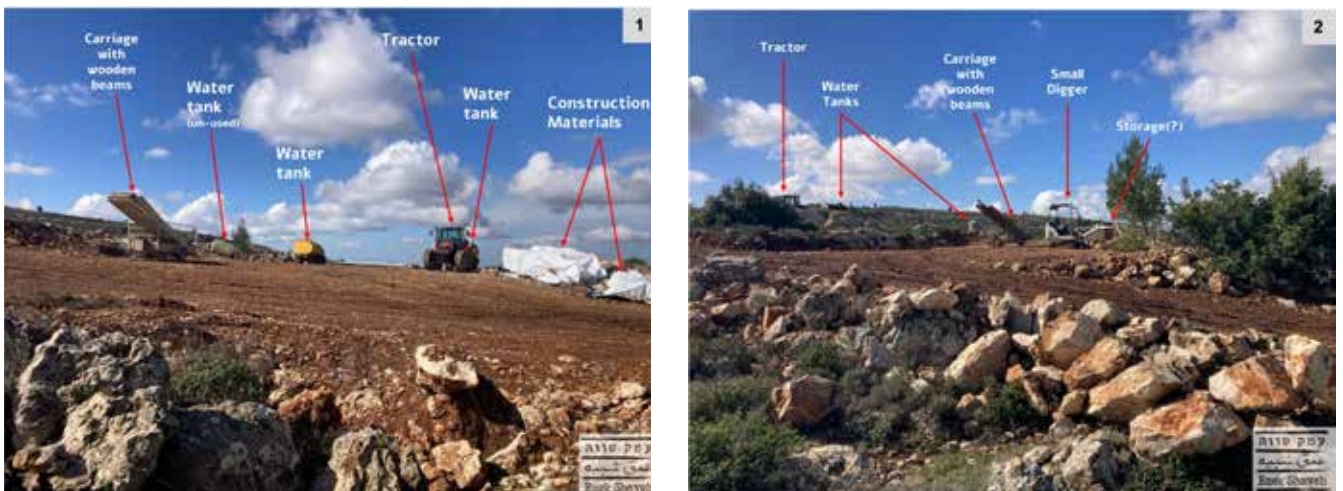


Fig. 6: The logistical areas 5 (left) and 6 (right).

Source: Emek Shaveh



Fig. 7: The "flattened area": 1. Looking south. 2. Looking north-west. 3. Looking north. 4. Looking west to the southern entrance to the area. Source: Emek Shaveh

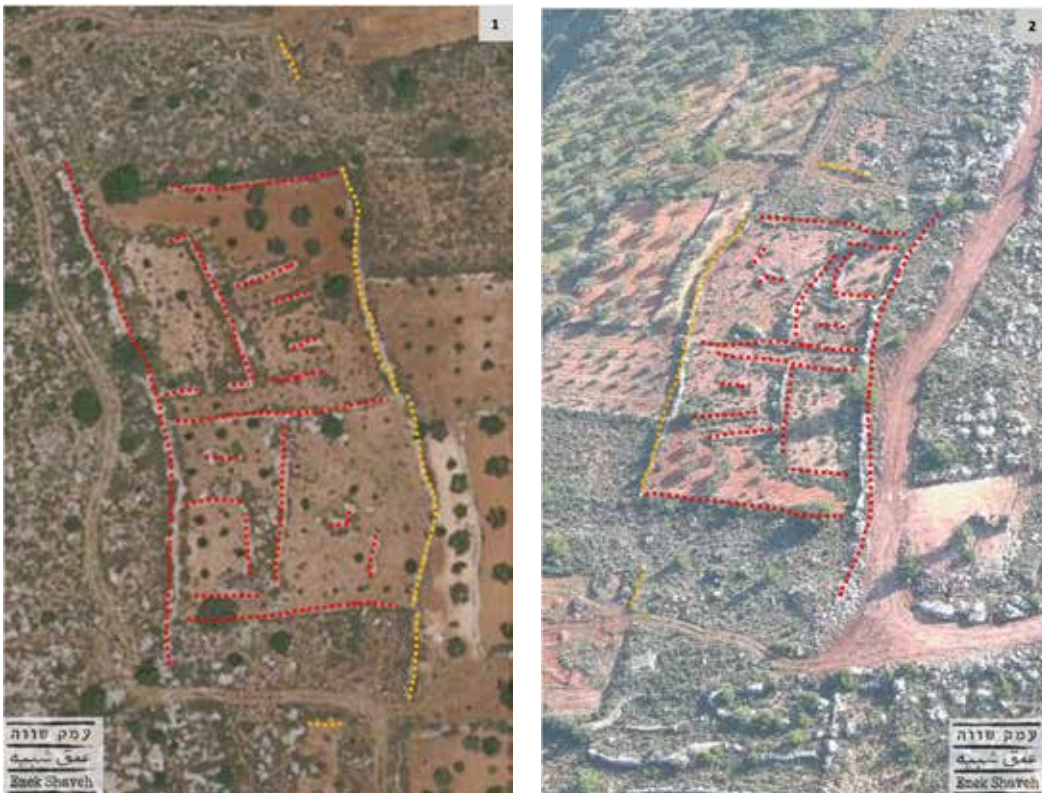


Fig. 8: Analysis of the "flattened" area damage to terraces. Red – destroyed. Orange – Damaged.

Source: Aerial photo: GovMap; Drone: Emek Shaveh

Notes

- 1 Peace Now alert (online) <https://peacenow.org.il/en/battir-outpost-december-2023>, 1.1.24
- 2 UNESCO (online), <https://whc.unesco.org/en/list/1492/>
- 3 UNESCO (online), <https://whc.unesco.org/archive/2023/whc23-45com-7A.Add4-en.pdf>
- 4 https://peacemaker.un.org/sites/peacemaker.un.org/files/IL%20PS_950928_InterimAgreementWestBankGazaStrip%28Oslol%29.pdf
- 5 UNESCO (online), SOC report 2023, <https://whc.unesco.org/en/documents/204945>
- 6 Peace Now Alert (online) <https://peacenow.org.il/en/settlers-established-a-new-outpost-on-the-lands-of-battir-west-of-bethlehem>, 14.3.22
- 7 UNESCO inscription file, <https://whc.unesco.org/en/list/1492/>
- 8 Emek Shaveh alert, <https://emekshaveh.org/en/israeli-government-battir-village/>, 23.9.14
- 9 <https://www.972mag.com/israels-top-court-gives-temporary-relief-to-palestinian-unesco-site/>, 4.1.2015
- 10 UNESCO (online) SOC report 2018 <https://whc.unesco.org/en/soc/3794>
- 11 Peace Now Alert (online) <https://peacenow.org.il/en/amid-a-pandemic-and-economic-crisis-israel-to-advance-at-least-4430-settlement-units>, 5.10.20
- 12 UNESCO (online) SOC report 2023, <https://whc.unesco.org/en/documents/204945>
- 13 UNESCO (online) SOC 2023 <https://whc.unesco.org/en/documents/204945>
- 14 Kerem Navot and Haqal report on Eviction Orders from 'State Land', https://www.keremnavot.org/_files/ugd/a76eb4_a511485a16f74e44a328efaa00e1444f.pdf
- 15 Yesh Din Data Sheet December 2023, https://s3.eu-west-1.amazonaws.com/files.yesh-din.org/data+sheet+2023/YeshDin+-+Netunim+2023+-+ENG_04.pdf

Environmental and Socioeconomic Challenges of the Al-Hawizeh Marshes

Salman Khairalla, Save the Tigris



Iraq's marshlands, particularly the Al-Hawizeh Marshes, are recognized as UNESCO World Heritage Sites for their extraordinary ecological and cultural significance. However, these regions are under severe threat from environmental degradation, oil exploitation, and mismanagement of water resources. This report examines these challenges, drawing from testimonies of local residents, environmental activists, and official sources, to provide a comprehensive overview of the multifaceted issues endangering the sustainability of Iraq's marshlands.

Environmental Threats and Oil Exploitation

The Al-Hawizeh Marshes, part of the southern Iraqi marshlands, face substantial threats from nearby oil fields. According to environmental activists, oil drilling activities are alarmingly close, with the Halfaya oil field just ten kilometers away and some

drilling towers less than a kilometer from the Hwiza marshes. These operations have resulted in frequent oil spills and gas flaring, causing extensive environmental damage and severe health issues among local populations, including increased rates of cancer and respiratory diseases. Furthermore, oil spills around the Marshes some areas has been use as rest place for the immigrants birds and Water buffalo when they graze beside the marshes , exacerbating the economic challenges faced by local communities.

A critical issue amplifying these environmental threats is the lack of comprehensive environmental impact assessments (EIAs) for new oil projects. The current assessments that the Iraqi government claimed to have conducted have been exposed, although it has not made them public. Many environmental experts believe that the process of completing these studies is

only a formality. The situation in the Hawizeh oil field exemplifies this shortcoming, highlighting the urgent need for more rigorous and transparent environmental impact assessments to mitigate the environmental impacts of oil exploitation. Drilling and mining in the area alarms the local population and reduces their living and hunting areas as indigenous people of the area.

The Marsh Arabs always say that the drying process that we have been going through for three years is a systematic effort against us to reduce the size of the marshes

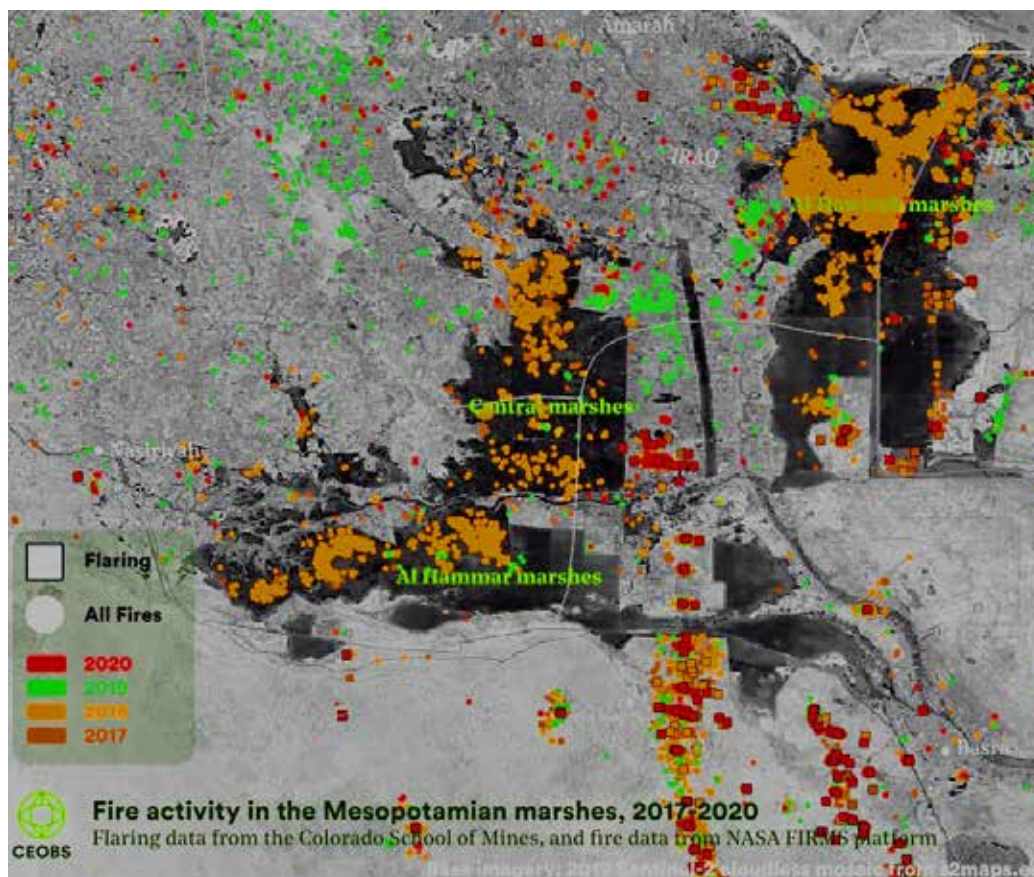


Fig. 1: Fire activity in the Mesopotamian marshes, 2017-2020.

Map: The Conflict and Environment Observatory



Fig. 2: Oil fields in the vicinity of the Hwiza marshes. Photo: Susan Schulman / The Guardian

and reduce the World Heritage Site, so that they can increase the number of oil fields.

Water Management and Strategic Environmental Assessment

The Ministry of Water Resources claims to have implemented a fair water distribution plan. However, testimonies from civil society and local communities suggest otherwise. Most of the marshlands in Maysan Governorate have completely dried up, indicating severe water scarcity. This discrepancy underscores a significant gap between governmental policies and the actual situation on the ground, necessitating a reevaluation of water distribution practices.

Moreover, Iraq has yet to conduct a comprehensive strategic environmental assessment (SWARLY) for all dams on the Tigris and Euphrates rivers. Such an assessment is crucial to understand the cumulative impacts of these dams on downstream ecosystems, particularly the marshlands. The absence of an SEA exacerbates the water crisis and threatens the survival of these vital habitats.

National Protection Status and Legislative Progress

Despite the inclusion of Iraqi marshes on the World Heritage List in 2016, legislative progress toward granting national protection status has been minimal. Geopolitical complexities, including Iraq's reliance on water flows from Turkey and Iran, complicate efforts to secure these ecosystems. International cooperation is essential to ensure the long-term protection and sustainability of the marshlands.

International and Regional Cooperation

The Iraq-Turkey Joint Permanent Committee addresses water management issues, and despite what the Iraqi government said here, there is no comprehensive cooperation with the Turkish government, especially after the visit of the Turkish Prime Minister, Mr. Erdogan. However, the Iraqi government did not

provide any additional information or details about the type of joint management of the Tigris and Euphrates basins. Therefore, civil society and experts have always demanded more details about these agreements, which the Iraqi government declared to be a joint management agreement for ten years.

Cooperation between Iraq and Iran concerning the Hawizeh Marshes (Hor al-Azim in Iran) is minimal. The closure of the Karkha River Marsh on the Iranian side has cut off a vital water source for the Iraqi marshes. Occasional water releases during periods of heavy rainfall are insufficient, underscoring the need for structured collaboration to manage and protect this shared ecosystem.

Socioeconomic Impact and Community Challenges

The marshlands support communities engaged in traditional practices such as buffalo breeding, fishing, and reed collection. These activities have been severely disrupted by government restrictions, environmental degradation, and reduced water availability. Activists report that residents are often prevented from accessing their lands, exacerbating economic hardships.

Local communities have expressed their frustrations through protests and appeals to government authorities. They demand the lifting of restrictive measures and the implementation of policies that support their rights and livelihoods. The lack of transparent communication and the imposition of restrictive measures without clear justification have further fueled discontent.



Fig. 3: A marsh Arab sitting in despair next to his buffalo dying of thirst, 2023.

Photo: Mustafa Hashem

Conclusion

The Al-Hawizeh Marshes face significant environmental and socioeconomic challenges. Addressing these issues requires urgent and comprehensive action, including enhanced regional cooperation, transparent environmental assessments, and robust legislative measures. Protecting Iraq's natural heritage is crucial not only for preserving its unique ecosystems but also for supporting the livelihoods and rights of the communities who depend on them. Ensuring the sustainability of these World Heritage Sites will require coordinated efforts at both national and international levels.

Threats to the Cultural Landscape and Archaeological Remains of the Bamiyan Valley

Abdurrahim Ahmadi

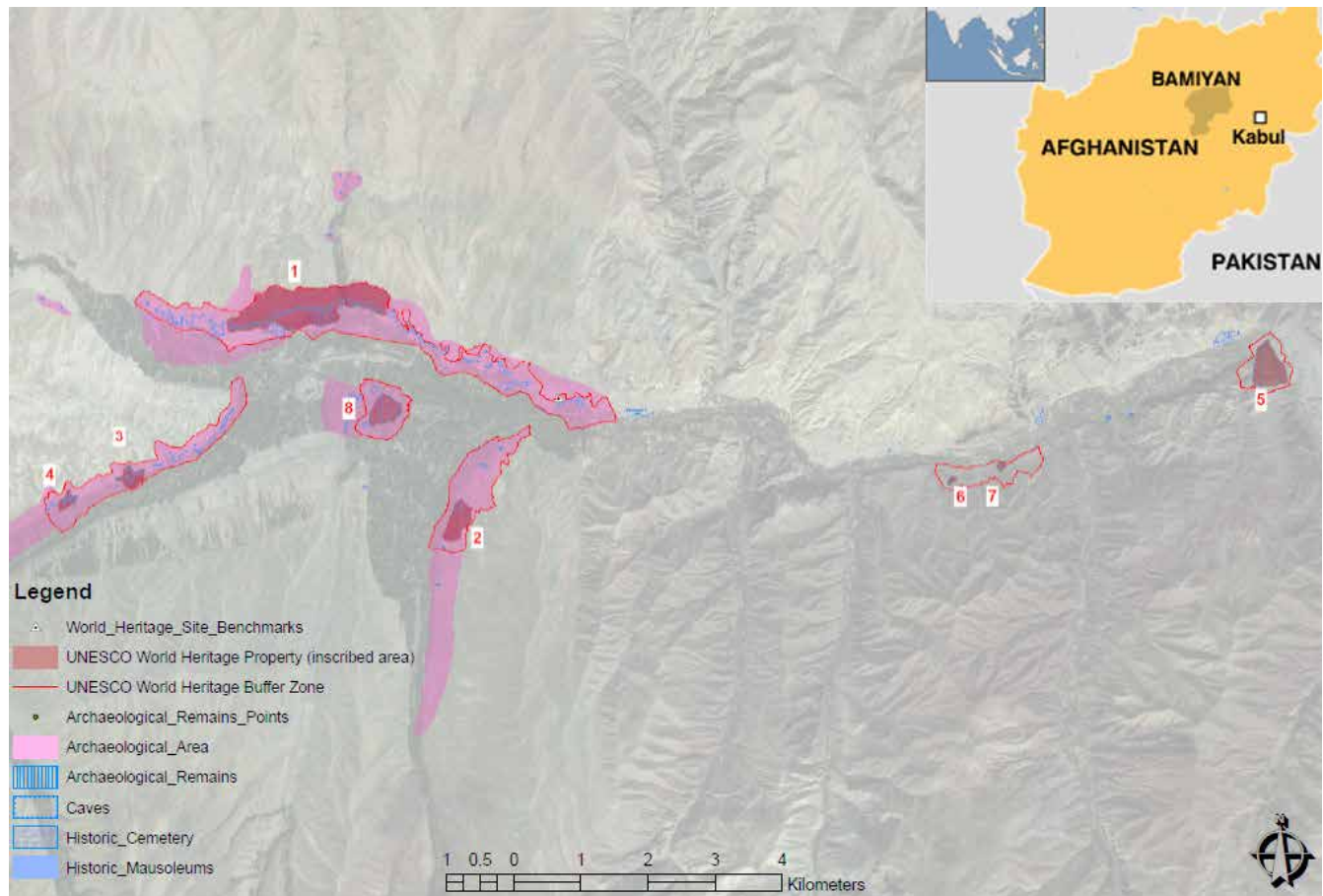


Fig. 1-5: Location of the UNESCO World Heritage Site in Bamiyan and new constructions in buffer areas in front of Buddhas and around Shahr-e-Ghulghula.

Map: GIS Data from Cultural Master Plan. Photos: local inhabitants

The Bamiyan Valley is located in the central part of Afghanistan. It contains valuable monuments such as the Buddha niches, painted caves in Folady Valley, Qala-e-Kafari A&B, Shahre Ghulghula, Shahre Zuhak, Qal'as in the valley plain, watchtowers, and a Caravan Sarai. These historical elements are located chiefly on agricultural land and some on cliffs. Most people in this valley are farmers, traditionally cultivating, irrigating, and harvesting their crops. All these elements, like monuments and farmlands, have created an extraordinary landscape.

The historical monuments that UNESCO inscribed on the List of World Heritage are listed below:

1. The Bamiyan Cliffs on the north side of the valley, including the two colossal niches that contained the 38-meter Buddha, seated Buddhas, 55 meter Buddha, and surrounding caves (Fig. 1);
2. The Karak Valley caves (Fig. 2), some 3 km southeast of the Bamiyan cliff, dating from the 6th to 13th century CE and formerly housing a more petite standing figure of Buddha, were also destroyed in 2001;
3. The two main essential groups of the Foladi Valley caves, the Qoul-i Akram (Fig. 3) and Kala-I Ghamai caves (Fig. 4) have important decorative features;



Fig. 2



Fig. 4



Fig. 3



Fig. 5

4. The elevated citadel of Shahr-i Zohak guards (Fig. 5) the entrance to the Bamiyan valley from the East;
5. The towers of Qala-i Kaphari (Fig. 6, 7) consist of fortification walls, towers, and citadels of earthen structures dating from the 6th to 8th century;
6. The historic city of Shahr-i Ghulghulah (Fig. 8, 9) is a fortified citadel situated on a hill in the valley's center, which dates from the 6th to 10th centuries AD. (Bamiyan Master Plan Compain, 2005, 152).

Hope and concerns for Bamiyan's cultural heritage sites

Last year was reasonably good for the cultural heritage in Bamiyan. UNESCO accomplished some restoration projects to protect the monuments. Despite this, there are severe problems with cultural heritage sites and their landscape in the whole valley, such as Buddha niches and caves inside cliffs, and the buffer areas in different areas are being threatened by various defacto factors.

According to individuals, in 2023, UNESCO did many activities in the Bamiyan valley, primarily in the Shahr-i-Zohak and Shahr-i-Ghulghulah sites. The pathways have been paved with

stone and cement mortar. Some monuments are partially restored. Some pictures show how activities and projects in historical sites are implemented.

The cultural landscape of the World Heritage in Bamiyan is in danger more than before because the Taliban does not consider the Cultural and Strategic Master Plans. In this circumstance, what and how people construct will severely threaten the World Heritage Sites. The most rapid changes are happening around Shahr-e-Ghulghula in front of the Buddha niches and the existing Bazaar.

Historical caves, the main parts of the World Cultural Heritage Site located in the Foladi Valley, have been continuously used as warehouses and kitchens since 2021. If this process continues, they will not remain at all. Another threat to the UNESCO world cultural heritage in Bamiyan is natural disasters. Heavy rains, snowfall, and climate change are the factors that affect UNESCO World Cultural Heritage sites in Bamiyan, especially the Buddha niches, which cracked due to explosions incorporated by the Taliban in 2001. Experts say those cracks widen every time due to surface water infiltration. These two last challenges have existed since the Taliban regime took power, and they do not consider preservation regularities in the mentioned areas.

Maybe the reason is that those monuments belong to the Buddhist cultural heritage.

According to statistics released during the previous government's rule, approximately 130 families live in caves surrounding the Buddhas of Bamyan. During the previous government's rule, the Directorate of Information and Culture of Bamyan province claimed they were seeking the evacuation of caves by residents and their livestock to maintain the ancient sites. How-

ever, over the two years of Taliban rule, a significant number of people have returned to cave dwellings, and the majority of these caves have once again become the dwelling place for numerous families, numbering in the tens. Many Bamyan residents have chosen to return to cave dwellings in the province, citing severe poverty and persistent unemployment as compelling reasons for this decision, as reported by several individuals. (Hasht-e-Subh, 19.09.2023)



Fig. 6, 7: Restorations of Shahr-e-Zohak.

Photos: local inhabitants



Fig. 8, 9: The drainage system above the Buddha niches which need to be maintained.



Photos: local inhabitants

Recommendations

To preserve the UNESCO World Cultural Heritage sites in Bamyan, I recommend the following activities:

1. Taliban must avoid spontaneous interventions in UNESCO World Cultural Heritage sites, such as excavations, and prevent construction in the core zone, buffers, and protection zones of all cultural heritage properties determined in the Bamyan Cultural Master Plan.
2. Drainage channels on the top of Buddha cliffs should be rehabilitated and maintained clean, especially during rainy

seasons, to prevent water penetration into the Buddha niches.

3. The vulnerable sites should be recognized, and locals and tourists should avoid walking there until restorations and consolidation occur.

References

Bamiyan Master Plan Campaign, 2005, 152

Hasht-e-Subh, 19.09.2023

<https://8am.media/eng/return-to-cave-dwelling-in-bamyan-province-residents-struggle-for-life-without-basic-amenities>

Access to Monitoring and Reporting: A Case Study from the Classical Gardens of Suzhou

Anonymous author

The most recent monitoring report on the Classical Gardens of Suzhou that can be found online is contained in the “Report on the Excellent Monitoring of China's World Cultural Heritage for the Year 2018”, published in June 2019 by the Chinese Academy of Cultural Heritage (a government institution) on its *China World Heritage Monitoring and Early Warning General Platform* (CWHMP). This online platform shows information about the Chinese World Heritage Sites including Periodic Reporting, Reactive Monitoring, Annual Conference and Annual Monitoring Report.

The 2018 Report selects only six World Heritage Sites in China, including a summary of the state of conservation and management of the Classical Gardens of Suzhou (achievements, key issues and reflections, and plans for the next phase of work), a summary of detailed information on the property itself (inventory of elements of the property, OUV, commitments to UNESCO regarding conservation, World Heritage Committee resolutions, basic information on the property, and a general

assessment), specific Reporting (progress on commitments, institutional and capacity building, physical protection of the property, factors affecting the property, conservation projects and related research), and a self-assessment of the monitoring process.

However, it is difficult to find this report even for Chinese readers. The title under which it appears on the internet is “Mogao Caves 2018 Annual Monitoring Report” instead of the mentioned one, and this is the only detailed report online for the Suzhou Classical Gardens. Everything except for the OUV description is written in Chinese, which makes it difficult for other language speakers to find and read it.

There are 9 out of 108 classical gardens in Suzhou inscribed on the UNESCO World Heritage List in 1997 (extended in 2000). The 2018 Report clearly states that the main body for the protection of Suzhou's landscape heritage is the Suzhou Landscape and Greening Administration Bureau (SLGAB), which has



Fig. 1: The location of the Classical Gardens of Suzhou. Most of them are located in the historic city center, indicated by a red rectangle, which suffers from severe traffic congestion, pollution and construction.

Graphic source: <https://www.chinadiscovery.com/jiangsu/suzhou/classical-gardens-of-suzhou.html>

a Heritage Construction and Management Division, a Conservation and Supervision Centre, and management offices for six of the inscribed sites: Suzhou Humble Administrator's Office, Suzhou Liouyuan Administrator's Office, Suzhou Lion's Forest Administrator's Office, Suzhou Netshi Garden Administrator's Office, Suzhou Changlang Pavilion Administrator's Office, Suzhou Lotus Roots Garden Administrator's Office. One site, the Retreat Garden, is under the responsibility of the Protection Management Committee of Tongli Ancient Town, Wujiang District, Suzhou, and receives guidance from the Suzhou Landscape and Greening Administration Bureau in terms of business (Chinese Academy of Cultural Studies, 2019, p89). SLGAB is the only management bureau in charge of those nine Classical Garden sites. The question is: Who supervises this bureau in order to make sure it does a proper job?

Unclear monitoring responsibilities

1. We can see the progress of the conservation and restoration work in the report, but we do not know more specific information about how the management is organized. Meanwhile, specific information about the gardens and forests in the report is provided by the China World Heritage Monitoring and Early Warning General Platform (CWHMP) database, but we do not know further information about how the Suzhou Landscape and Greening Administration Bureau (SLGAB) cooperates with the CWHMP.

Lack of reporting and transparency

2. The 2018 Report mentions that Decision 32COM 7B.66 invited the State Party to submit to the World Heritage Centre by 1 February 2009 an approved Master Plan for 2007-2020 and the Heritage Management Plan for the City of Suzhou, as well as a summary of the content in English, for review (Chinese Academy of Cultural Studies, 2019, p.111). On the UNESCO Suzhou Classical Gardens document page, however, the latest State of Conservation Report is dated 2008, so it is not possible to verify if these documents were submitted, or to check and understand the status of the property since then. Furthermore, the 2018 monitoring report of the Suzhou Classical Gardens, which is the reference for this paper, is also written in Chinese and



Fig. 2: Aerial view of the Humble Administrator's Garden nestled in the inner city of Suzhou.

Photo source: <https://www.klook.com/en-MY/activity/12448-humble-administrators-garden-ticket-suzhou-hangzhou/>

difficult to find online, which is undoubtedly an obstacle for non-Chinese-speaking heritage researchers, including most UNESCO and ICOMOS officials. In the meantime, the above-mentioned 2018 Report shows that the Suzhou Master Plan for "Paradise Suzhou - City of Hundred Gardens" is in progress.

Lack of professional and public involvement

3. The report mentions that "social forces have been actively introduced to strengthen the management of landscape protection, and a volunteer team has been set up to supervise the protection of Suzhou's gardens and forests", and that in 2018, the number of volunteers was 35, while the number of people working in the Administration was 260 (Chinese Academy of Cultural Studies, 2019, p.92). The report also mentions that fewer full-time and mostly part-time staff do the monitoring work.

Unresolved Issues

4. In the buffer zones, there are unauthorized structures and alterations, itinerant vendors setting up stalls at will, and there are problems of residents around the gardens piling up debris and using electricity in contravention of the law, which are difficult to regulate effectively (Chinese Academy of Cultural Studies, 2019, p.92).
5. The Suzhou Classical Gardens are located in the business district of Suzhou, and there is still no better solution to address the impact of the construction of modern buildings for business and trade on the heritage due to the lack of authority and professional and technical capacity of the Administration Bureau (SLGAB).
6. Damage to heritage by tourists' uncivilized behaviour. The report mentions that on 6 October 2018, a female tourist climbed onto a roof of the Humble Administrator's Garden scenic spot in order to take photos, causing damage to the tiles, against which the solution was to set up warning signs and soft railings (Chinese Academy of Cultural Studies, 2019, p.137).
7. The statistics on tourist information are too brief. In the report's statistics table on the number of tourists in 2018, except for the number of tourists in each month, the number of tourists with reservations, the number of days exceed-



Fig. 3: A tourist stepping on a rooftop in the Humble Administrator's Garden.

Photo source: Annual Report on the Excellent Monitoring of China's World Cultural Heritage for the Year 2018

ing the daily capacity limit, and the number of tourists with interpretation services are all shown as zero, and there are only three types of evaluation of the impact of tourists, namely, "Positive Impact", "Negative Impact", and "Both Positive and Negative Impact".

Possibility and benefits of solving the above problems

Suzhou Classical Gardens are not only the cultural heritage of the Chinese people, but also cultural treasures of the world. Its history can be traced back to the 6th century BC. Scientific research to be carried out is how to better share and pass on the cultural heritage to a wider group of people. This is the question this article wants to think about.

At present, all management and monitoring work related to the Suzhou Classical Gardens is carried out by the Suzhou Landscape and Greening Administration Bureau. China has a long history of implementing measures to supervise the work of government departments. The 2018 Report mentioned that the reason for the inability to effectively manage the property was "the problem of being unable to carry out effective work due to a lack of management authority and professional and technical capabilities". Based on this, should the structure of the Suzhou Administration and Greening Administration be adjusted to delegating tasks to non-governmental units?

The report does not mention the participation of non-governmental organizations and social groups who deal with gardens and culture. The number of Chinese people mentioned is 35 volunteers a year. The international participation only mentions the "Asia-Pacific Research and Training Suzhou Center." The construction of the project shows that it is still in the early preparation stage of heritage cooperation. The report also mentioned "actively promoting the construction of a heritage supervision center". Is there any progress in the work of the relevant government departments to supervise the administration? The workload and working time of setting up a new government department are huge. If this plan cannot be implemented in a short period of time, in addition to the supervision of government agencies, can it increase the participation of the public to increase and promote heritage-related work?

The report clearly mentioned that the lack of talents for heritage protection is a major issue that needs to be considered and solved. Talents majoring in world cultural heritage research are relatively few, and mostly the talents hired come from computers, artificial intelligence, urban design, architecture, civil engineering, archaeology, anthropology, linguistics, sociology, psychology, literature and other fields. A full academic curriculum on cultural heritage studies should be urgently established in order to fill that gap.

However, by expanding the volunteer team and encouraging non-governmental organizations related to world cultural her-

itage to join, communication and cooperation with various international and domestic professional organizations can be strengthened. Improve the ability to protect Suzhou's Garden heritage, be more conducive to solving technical problems encountered in the repair and maintenance process, and expand the visibility of the heritage in the world, using the value of Suzhou's garden cultural heritage to display, disseminate and promote excellent traditional culture. It is feasible to welcome more heritage enthusiasts with professional knowledge to participate in the protection of Classical Gardens. UNESCO's World Heritage Cities Programme aims to assist States Parties in the challenges of protecting and managing their urban heritage, by increasing international level of cooperation, it is another potential solution for sustainable tourism development.

Warning signs and guardrails are not enough to deal with tourists' uncivilized behaviour. The community is not only the enjoyer of heritage, but also the carrier of heritage knowledge and quality. Raising the awareness of tourists to respect and protect heritage can be carried out through regular seminars, workshops, and the recruitment of volunteers at the social level. Training courses related to landscape heritage should not only target professionals, but should also focus on the community, after all, they are also consumers of attraction tickets, cultural and innovative products, and inheritors of cultural heritage.

The management must be cautiously aware of the influence of urbanization on the Classical Gardens of Suzhou. The fact that the Nanjing Qinhuai Little West Lake Project won the UNESCO Asia-Pacific Heritage Award for Cultural Heritage Conservation is plausible evidence that heritage can be well preserved and achieve rejuvenation. Change should take place within limits that will not disrupt Outstanding Universal Values (Phillips, 2009, p.39). Urban design should be actively adjusted to Heritage Sites such as the Classical Gardens which are located in the old city center of Suzhou but now also in the center of its modern commerce and trade district, and their existence should not be the sacrificed to urban development.

References

- Chinese Academy of Cultural Heritage (2019). China's Excellent World Cultural Heritage 2018 Monitoring Annual Report. <https://www.wochmoc.org.cn/upload/file/201906/1560819908698061443.pdf>
- Chinese Academy of Cultural Heritage (n.d.). 中国世界文化遗产监测预警总平台 (General Platform for Monitoring and Early Warning of China's World Cultural Heritage). [online] www.wochmoc.org.cn. The part on Suzhou can be found at: <https://www.wochmoc.org.cn/channels/151.html?11013?Classical%20Gardens%20of%20Suzhou?1> [Accessed 1 Feb. 2024].
- UNESCO (2009). World Heritage Cultural Landscapes: A Handbook for Conservation and Management.
- UNESCO World Heritage Centre (n.d.). Classical Gardens of Suzhou. [online] UNESCO World Heritage Centre. Available at: <https://whc.unesco.org/en/list/813/documents/>.
- UNESCO World Heritage Centre (n.d.). World Heritage Cities Programme. [online] UNESCO World Heritage Centre. Available at: <https://whc.unesco.org/en/cities/>.
- Zhou Wei Quan (2008). 中国古典园林史 / History of Classical Chinese Gardens. 清华大学出版社, Beijing: Tsinghua University Press.

Cornering the Subak: Threats from Development Planning in Bali's Cultural Landscape

Wiwik Dharmiasih, Yefta Sutrisno, I Gede Yudha Bhismaya, Ni Luh Emi Dwiyanti

The Subak is a traditional irrigation system that supports rice cultivation in Bali. It produces the iconic ricescapes associated with the island's cultural tourism. However, the very existence of the subak is under threat. Every year, subaks lose an average area of 1,000 hectares. The rapid pace of urbanization and tourism growth, compounded by climate change, led the government to propose the subak system for protection as a site of world cultural heritage.



Fig. 1: Subak Landscape of Jatiluwih.

Photo: Authors

In 2012, UNESCO inscribed the subak system as a World Heritage Site. The official name of the site is the Cultural Landscape of Bali Province (CLBP). It is the only cultural landscape in Indonesia, and unique among the few World Heritage Sites that incorporate resident lives and livelihoods in the site. Gaining designation served as a major source of pride not only for subak farmers, but also for Balinese and the Republic of Indonesia. The entirety of the site represents the Balinese philosophy of Tri Hita Karana (THK) as the site's Outstanding Universal Value and basis for designation. THK represents the three causes of prosperity, balancing the relationship between humans, and between humans and the environment and spiritual realms.

Evidence shows the origins of the subak system dating back over a thousand years. Bali's cultural landscape has four sites spread across the five different provinces of Bali. These sites symbolize the importance of the subak. The sites are the Su-

preme Water Temple of Pura Ulun Danu Batur, the Subak Landscape of the Pakerisan Watershed, the Subak Landscape of Catur Angga Batukaru, and the Royal Water temple of Pura Taman Ayun (UNESCO, 2024a). Collectively these sites represent the upstream and downstream features that balance the universe and preserve harmony in the world.

In this brief article, we first describe designation challenges before shifting our focus to spatial and development planning processes impacting the subak social ecological system and changing the Balinese way of life. Despite UNESCO attempts to protect the subak, political developments are further marginalizing the subak as an institution.

Subak challenges since designation

In the past few years, we have followed the different ways policies and management decisions have impacted local people and the environment. Since CLBP's initial designation, the main risks to the subak have increased. This not only applies to the CLBP, but also across the 1,200 subaks across Bali (Davis, 2015). The Governing Assembly was initially designed to ensure all key stakeholders were part of site management. However, it quickly became apparent that a top-down management structure undermined the subak cultural institutions that nomination had intended to protect and empower. Bottom-up coordination forums aimed to increase local farmer participation, but without committed institutional support, convening opportunities declined.



Fig. 2: Restaurant in Subak Jatiluwih.

Photo: Authors

Rapid tourism development has had significant impacts. Aware of the potentially irreversible developments taking place in the subak, various organizations tried to support a Sustainable Tourism Strategy to guide initiatives on terms acceptable to subak institutions. Lack of lasting institutional support, however, meant that subak role in tourism development also lost traction.

Development continues to expand significantly in CLBP core zones. Rice fields, the very object of protection, have been converted into tourism facilities in what local residents describe as a “mushrooming” effect. Lack of livelihood opportunities amid increasing costs of living have compelled many local farmers to convert their productive rice fields into tourism kiosks, and external financing has supported massive development of restaurants, homestays, and villas. Not only are ricescape being lost, water is also being diverted away from subaks to support tourism infrastructure. Furthermore, sedimentation and erosion, increased wastewater, and solid waste pollution in the rice fields, affect the overall integrity of the subak.

As a bedrock cultural, livelihood, and environmental management institution throughout Bali, the subak has faced significant pressures to change over the past millennia; yet, the most recent developments in Bali have notably weakened subak authority relative to village and state institutions. At the CLBP, this means subaks have limited authority on overall site management and obtain only a small percentage of tourism income. This not only impacts the subaks within the CLBP, but also elsewhere across the island. Land use change fills in rice fields to make way for large development projects influenced by international finance and state development plans for the island province. This emerging political dimension is what we turn to next.

The consequential politics of spatial planning

The CLBP is administered across different levels of government. The Ministry of Education and Culture and the Provincial Government are the main policy proponents. However, the largest



Fig. 3: Tourism attraction in Subak Jatiluwih.

Photo: Authors

amount of land area is located in the District of Tabanan. The Tabanan district government, however, has yet to approve their spatial plan. This means guidance on the determination of land uses is not yet determined under development planning policy. In recent years, the lack of a district spatial plan has been used as a means to justify development. At the time of writing, there are indications that Tabanan will finalize a new spatial plan. The spatial planning designation has significant implications on development across the district, particularly in areas designated for subak activities. Many converted rice fields in recent years pointed to the lack of a spatial plan as justification for their development, even in the CLBP core zone.

While on the one hand final passage of the spatial plan provides certainty over land uses and indicates potential violations, there is concern on the other hand that the resultant plan could result in significant future reduction in rice growing areas. The government argues that it took a long time for them to process the spatial planning regulation because the data between the central government and the Tabanan government was not synchronized, particularly in determining “Protected Rice Field” areas.

For example, the central government, under the Directorate General of Spatial Utilization Control and Land Tenure, recorded 19,100 hectares of Protected Rice Fields area in Tabanan. However, the district only recorded an area of Protected Rice Fields at 16,100 hectares. The differences were negotiated with the Ministry of Agrarian Affairs and Spatial Planning in May 2023 and coincided with hearings on the neighboring Badung district spatial plan. A total of 17,835 hectares was determined for Tabanan’s Protected Rice Field areas. This negotiated agreement occurred after government agencies verified Protected Rice Fields already permitted to investors, but had not been built (Nusa Bali, 2023).

A lot of changes in spatial planning took place during the COVID-19 pandemic, specifically in preparation for the return of tourism. The Tabanan government began planning ways to free up rice fields for tourism investment, with aims to boost regional economic development (Berita Bali, 2023). If these subtle yet significant changes take place in the spatial plan, it could mean profound changes for the CLBP, accelerating losses to the region’s rice fields. Development of villas and restaurants in the rice fields of Subak Jatiluwih, a site at the heart of the CLBP, reinforces these broader planning dilemmas. When visiting the site, it is common to see changes and hear solicitations to buy or build on rice fields. We surveyed farmers going to fields and many indicated their involvement in villa construction sites. This has become a common local side job to complement farming routines. When asking a group of farmers how many villa construction projects were underway in 2024, answers were surprising: “There are many!” they replied proudly, half-jokingly asking, “Do you know anyone that would like to invest?” (Personal communication, 2023)

In and around subak Jatiluwih, many changes are taking place. Despite subaks strict past regulations against conversion of paddy fields rooted in traditional rules (*awig-awig*), land conversion is widespread. This indicates the eroding authority of the subak to prevent against its greatest existential threat: land conversion. An accompanying problem is the issue of labor, specifically the question around who will be the farmer of the future. With the sense that farming is associated with hard labor that yields underwhelming profits, there are very few young people that are interested in inheriting subak farming practices.



Fig. 4: New construction site in Subak Jatiluwih.

Photo: Authors

Conclusion

The UNESCO World Heritage Centre and Advisory Bodies in 2023 (UNESCO, 2024b) requested the State Party to provide a Heritage Impact Assessment (HIA) for developments at the site. UNESCO designation has accelerated tourism destination in the CLBP, providing tourism benefits for some. Unfortunately, these benefits are unevenly experienced, and many local farmers are concerned about the potential irreversible loss of a way of life that has been sustained for generations. Despite changing local perspectives in support of tourism development for boosting the regional economy, many farmers are unsettled by the

pace of change taking place transforming their landscape and changing their cultural institutions.

This is unfortunate given that these accelerated development initiatives were exactly what designation was to protect against. With the spatial and development plans being rewritten at the district scale to accommodate development, the subak is likely to be further pushed to the margins.

Given this context, we propose various recommendations. First, UNESCO should proceed with requesting the State Party conduct an HIA and identify the extent to which the site has incurred changes. Second, to address the pace of development, a mapping initiative should identify conservation areas, especially in core zones, and develop enforcement mechanisms for those that convert land beyond allowable subak practices. Third, the subak should be placed as the leading institution responsible for site management, with a greater portion of proceeds allocated to them. Fourth, various initiatives for restoring more environmentally-sound agricultural practices should be supported in earnest. Fifth, planning for the generational transition of the ricescapes needs to begin now in order to keep young people interested in inheriting the subak.

References

- Davis, M. (2015). *Managing a living cultural landscape: lessons and insights from the subaks of Bali, a UNESCO World Heritage Site*. Stockholm Environment Institute. <http://www.jstor.org/stable/resrep00442>
- "RTRW Tabanan Wajib Tuntas Tahun 2023." (4 February 2023). Nusa Bali. Available from: <https://www.nusabali.com/berita/134978/rtrw-tabanan-wajib-tuntas-tahun-2023> [26 January 2024]
- "Sahkan RTRW, Pemkab Tabanan Akan bebaskan 1.700 Hektar Lahan Sawah Dilindungi" (14 June 2023). Berita Bali. Available from: <https://www.beritabali.com/read/sahkan-rtrw-pemkab-tabanan-akan-bebaskan-1700-hektar-lahan-sawah-dilindungi> [24 January 2024]
- UNESCOa. (2024). "Cultural Landscape of Bali Province: the Subak System as a Manifestation of the Tri Hita Karana Philosophy." Available from: <https://whc.unesco.org/en/list/1194/> [26 January 2024]
- UNESCOb. (2024). "Cultural Landscape of Bali Province: the Subak System as a Manifestation of the Tri Hita Karana Philosophy." Available from: <https://whc.unesco.org/en/soc/4424> [27 January 2024]

Constant Vigilance Required in the Tasmanian Wilderness



Jimmy Cordwell and Alice Hardinge, The Wilderness Society

The Tasmanian Wilderness World Heritage Area (henceforth the 'Tasmanian Wilderness') is the globe's equal highest-ranked World Heritage area, meeting an astounding 7 out of 10 World Heritage criteria - including all four natural criteria - effectively making it the world's highest-rated World Heritage wilderness.

Stretching from sea to sky, the rugged landscape has stark outstanding universal value. A diverse cultural landscape, Tasmanian Aboriginal people - the Palawa - have managed this landscape for over 40,000 years. It's a wilderness landscape with a varied glacial history. Its enigmatic mountainous skyline of ice-carved dolerite and quartz, is flanked by lush temperate rainforests home to endemic flora and fauna with deep, evolutionary roots to the time of the supercontinent Gondwana. Lutruwita/Tasmania is a microcosm of the greater continent of Australia. Given its unique disconnected history, this ancient island is a hot-spot for unique species. Flora such as *Eucalyptus regnans*, the globe's tallest flowering plant, or *Nothofagus gunnii*, another Gondwana relic and the only winter-deciduous plant in the continent; and fauna such as the iconic Tasmanian devil (*Sarcophilus harrisii*), Tasmanian wedge-tail eagle (*Aquila audax fleayi*), or the ancient Maugean skate (*Dipturus maugeanus*), all find crucial refuge in the Tasmanian Wilderness.

However, despite the remote, wild character of the Tasmanian Wilderness, these incredible natural and cultural values require ongoing world class management across the property. In a global biodiversity crisis, these threatened and endangered species - including IUCN listed species - require careful management. Yet these are at risk, even within the Tasmanian Wilderness, from further anthropogenic activities. The need for further oversight and management is becoming increasingly more urgent with the increased risks of climate change, introduced species, improper management and inappropriate development that the Tasmanian Wilderness is facing.

We stress the urgent need for increased oversight of the properties management - including the UNESCO Annual State of Conservation reports - to improve and strengthen management within this iconic landscape. Of concern within the Tasmanian Wilderness includes: the management of threatened and endangered species (including IUCN listed species), with the last State of Conservation report not including the Maugean skate;

biosecurity and invasive species; avoidance of ecosystem restoration within the property in the UN Decade of Ecosystem Restoration; statutory management and tourism development policies that actively encourage wilderness development; and outstanding responses to Reactive Monitoring Mission (RMM) update of 2015/16.

Inappropriate development in Tasmanian Wilderness remains a priority supported by a state government process that actively encourages development within the wildest corners of the property. This has been brought to the attention of WHC¹. Lodges, infrastructure, helicopter tourism, exclusive leases of public, World Heritage land and waters: these, and more, are included in a pipeline of developments supported by the state government. There is no consideration of the cumulative impacts these will have on the spectacular wilderness values of this property. There are ongoing attempts to instate this process - known as the Parks Privatisation (or 'Expressions of Interest') Process - in state legislation. This is known as the Reserve Activity Assessment Process, a statutory plan for the Tasmanian Wilderness formalising the intentions of the Parks Privatisation Process.

The development of fossil fuel projects off the coast of Tasmania also threatens the Tasmanian Wilderness, as an oil spill or gas pipe leak in the adjacent Bass Strait would have catastrophic effects on the islands expansive western coast line and harbours. The current gas exploration by Conoco Phillips of King Island is an example of such a threat.

The Tasmanian Wilderness contains approximately one third of Macquarie Harbour, now home to the only known remaining population of the endangered Maugean skate (*Dipturus maugeanus*). The skate is a Gondwana era relic, and the only skate in the world known to mostly inhabit brackish waters. On 16 May 2023, scientists interrupted their research program to publish their findings of a 47% decline from 2014 to 2021 in Maugean skate numbers in Macquarie Harbour. It is classified as "Endangered" by Australia's Environment Protection and Biodiversity Conservation Act 1999 (Cth) and is currently being considered for uplisting to Critically Endangered.

¹ Decision 44 COM 7B.75 .7



Fig. 1: A Maugean skate.

Photo: The Wilderness Society

Conservation Advice for the Maugean skate (*Dipturus maugeanus*) prepared by the Australian Department of Climate Change, Energy, the Environment and Water, in effect under the EPBC Act as of 6 September 2023, identified key urgent actions requiring implementation prior to the Australian summer of 2023/2024 to prevent the extinction of the Maugean skate (*Dipturus maugeanus*). These included, as the highest priority, the elimination or significant reduction of fish biomass and feeding rates in Macquarie Harbour. Despite this, neither the Federal nor Tasmanian state governments have required any reduction in fish biomass or feeding rates in Macquarie Harbour. These marine farming operations in Macquarie Harbour still pose an urgent and ongoing threat to the endangered Maugean skate (*Dipturus maugeanus*), a species of recognised World Heritage value.

Several organisations wrote to UNESCO in April 2024 alerting the World Heritage Committee to an urgent threat to the heritage value of the Tasmanian Wilderness. The letter requested the assistance of UNESCO and the IUCN to intervene, to call for protection of the Maugean skate (*Dipturus maugeanus*) and ensure the heritage value of the property is preserved. UNESCO has since requested a response from the State parties. Given the imminent risk of extinction, it would be appropriate for this matter to be addressed at or before the WHC 46th session, in July 2024.

Australia's most recent State Party Report on the State of Conservation of the Tasmanian Wilderness (and related 2023 update) failed to convey to the World Heritage Committee the

threat level to, and consequent urgency of protecting, the Maugean skate (*Dipturus maugeanus*), based on the most recent scientific evidence and conservation advice. The Tasmanian Wilderness has since been retired from the State of Conservation reporting process. The Australian Government's failure to act on Conservation Advice, and its delay in making a decision on reconsideration of EPBC 2012/6406, leave us concerned that Australia is not acting in accordance with its World Heritage management principles nor meeting its obligations under the World Heritage Convention.

We appreciate that the project that is the Tasmanian Wilderness is ongoing, and there are values within the property that require strong stewardship; even restoration. During the UN Decade of Ecosystem Restoration,² the restoration of the flooded Lake Pedder – a 10km² lake submerged under a hydroelectric reservoir at 240km² in size - must be a priority. State parties are ignoring the timely and salient calls for restoration, despite the ageing dam infrastructure that keeps the lake flooded requiring major works. This requires open debate and discussion, and a lack of accountability of State parties is further hampering this discussion from occurring.

Following the Reactive Monitoring Mission Report³ - with its recommendations agreed to in full by State parties in 2016 - there remains completion of several key management cri-

² www.decadeonrestoration.org

³ <https://whc.unesco.org/document/140379>

teria of the property yet to be met⁴. These include the completion of a Comprehensive Cultural Survey⁵ – RMM Recommendation 13 – the prevention and management of biosecurity risks, the management of boundary areas to the Tasmanian Wilderness – RMM Recommendation 19⁶, despite logging on the flanks of World Heritage listed Quamby Bluff and joint management with the Tasmanian Aboriginal Community – RMM Recommendation 20. Additionally, we contacted WHC regarding RMM Recommendation 11, given the state government chose not to protect Future Potential Production Forest (FPPF) Land in the Tasmanian Wilderness within national park tenure, as was committed to through the RMM. The following list further captures correspondence sent to state parties (State and Federal governments) regarding the need to vastly improve the management of the Tasmanian Wilderness:

- February 24: Federal Government Submission re: expansion of fish farms, threatening the critically endangered Maugean Skate in the TWWHA (Sent to Australian Government);
- April 24: Proposed changes to statutory environmental impact assessment process - the Reserve Activity Assessment (RAA) (Sent to Tasmanian Government);
- March 23: Edgar Dam & Public representation extension request (Sent to Tasmanian Government);
- May 23: Biosecurity threats to TWWHA values (Invasive Deer) (Sent to UNESCO Chair); Nov 22: Update on TWWHA Reactive Monitoring Mission 2015 and Recommendations 3, 5 & 7 (Sent to UNESCO Chair);
- September 22: Letter regarding EPBC Portal & Public Comment on Lake Malbena development (Sent to Australian Government);
- May 22: Withdrawal of Lake Malbena Planning Application (Sent to Tasmanian Government).

The Tasmanian Wilderness was taken out of regular state of conservation consideration in 2022 – the Tasmanian State Government has struggled to hold ministers in portfolio positions, with 6 Parks Ministers in under 5 years leading to a loss of institutional stewardship for management in the Tasmanian Wilderness. We again stress that there remains a continued need for ongoing oversight of UNESCO via required annual State of Conservation reports to improve management within the Tasmanian Wilderness, as a matter of urgency.

⁴ Decision 44 COM 7B.75.3 (<https://whc.unesco.org/en/decisions/7791>)

⁵ Decision 44 COM 7B.75.4

⁶ <https://whc.unesco.org/document/140379>

IV. Properties with Indigenous Peoples

A Review of the 2022 Reactive Monitoring Mission to Wood Buffalo National Park



Braya Quilty and Carmen Wells, Fort Chipewyan Metis Nation

Wood Buffalo National Park (WBNP), a naturally designated park and managed by Canada, boasts Outstanding Universal Values (OUV's) such as whooping crane, wood bison, karst salt plains, and the world's largest freshwater inland river delta in North America, the Peace Athabasca Delta (PAD). WBNP has been through many State of Conservation Reports and two Reactive Monitoring Missions, one of which was conducted in 2022.



Fig. 1: The Peace Athabasca Delta in Wood Buffalo National Park. Photo: Aaron

The 2022 Reactive Monitoring Mission

Below, we highlight several recommendations of the 2022 Reactive Monitoring Mission:

Recommendation #1: "Strengthen efforts to transition to a genuine partnership with Indigenous rights-holders in governance and management of the property."

Recommendation #1 has further points about supporting the Indigenous caucus in developing an indigenous-led vision for a shared governance model of WBNP, creating CMC ToR, supporting Indigenous communities' initiatives of interpreting and valorising values of WBNP. This is very important, specifically in the case of the Fort Chipewyan Metis Nation (FCMN), who many rights holders contest to being removed from the park, and there is much work to be done to reunite the community with their traditional territory and heal the relationship with the land and FCMN members. Reconciliation needs to occur, based on principles from the 11 nations within the park, with a co-created encompassing workplan.



Fig. 2: The Board of Directors of the Fort Chipewyan Metis Nation.

Photo: Fort Chipewyan Metis Nation

Recommendation #2: "Complete hydrodynamic modelling and ELOHA (environmental flows assessment) tools that are essential to understanding the current hydrology of the Peace River and the PAD, the natural, pre-Bennett Dam baseline condition, the impact of climate change, and the feasibility of benefits to be derived from proposed water control structures and strategic flow releases on the OUV of the property."

Recommendation #3: Construct and repair water control structures in the PAD (such as the planned weir at Dog Camp) only after modelling and environmental flows tools have been completed, allowing an understanding of the benefits to the PAD, potential interactive effects and downstream impacts.

The recommendations discuss complete hydrodynamic modelling, and environmental flows of the Peace River and the Peace Athabasca Delta, and construct and repair water control structures in the PAD.

Canada is working on the hydrodynamic modelling for the water control structure and how that would work within the PAD. However, the inter-jurisdictional issues within the workings and release of the Bennett Dam need to be expedited, as the water control structure is meant to be a temporary measure and may not fulfill all the water needs of the delta.

Recommendation #7: “Before the end of 2024, conduct an independent systematic risk assessment of tailings ponds of the Alberta Oil Sands region with a focus on risks to the PAD.”

Recommendation #9: “Before 2026, develop a clear, consensus-based strategy consistent with precautionary principles for the reclamation of tailings ponds, including the treatment and disposal of OSPW, with guarantees protection of the Athabasca River’s and PAD’s water quality and avoids any impacts to the OUV of the property.”



Fig. 3: Oil goes into a tailings pond at an oil sands operation in Alberta. Photo: Alex MacLean

FCMN is very concerned about the ongoing seepage occurring from an oil sands operation upstream from the PAD. Without the risk assessment of tailings ponds, FCMN has no clarification what risk the tailings ponds may submit to the ecosystem, or the impact to the rights of FCMN.

There are many things to consider in recommendation 9. The cumulative impacts of the Alberta oil sands treated oil sands processed water (OSPW) release into the Athabasca River may never be calculated as FCMN has speculation that each project will apply through the Alberta regulator as an individual project, and industry proponents will only be responsible for their project footprints.

As well the impact on the FCMN way of life, rights, and culture from treated OSPW. FCMN historically are proud fishermen, and the release of treated OSPW may have devastating consequences to our way of life.

The 45th Session of the World Heritage Committee

At the 45th session of the World Heritage Committee, the decision was reflective of the RMM of 2022.

A key piece within the decision was the “continued absence of adequate risk assessment for large tailings ponds upstream” - to date FCMN has not seen any forward motion of the tailings risk assessment that is required by world heritage by the end of

2024. There may be speculation in the past that the Alberta Oil Sands Monitoring Program would manage this, but the project was not approved, so there is still no mechanism to complete this task. FCMN is concerned that Canada will not meet the deadline.

FCMN has also seen no forward motion of a consensus-based strategy for reclamation of tailing ponds including treatment and disposal of OSPW, other than a push for a regulation for release.

Overall, the world heritage decision is very hopeful, however there is a concern that the timelines within the recent decision of World heritage will not be met.

Fort Chipewyan Metis Nation Way of Life

The PAD is a great concern, the way of life and rights of FCMN also includes the tributaries of the PAD, the Peace River and Athabasca River.

The Athabasca has been known as the Metis highway, generations have lived on and used both rivers for sustenance purposes and continue to do so today. The Peace River is also a part of the communities’ way of life.



Fig. 4: A Fort Chipewyan Metis fisherman. Photo: Fort Chipewyan Metis Nation

FCMN through recent studies, have learned that the majority of the community has a very high wild foods diet, and still drinks from the wild waters on the land. Treated Oil Sands Processed Water may potentially forever change the FCMN way of life.

FCMN has created the Way of Life Framework, or WOLF for short. WOLF is a culmination of years of input from the Nation who shared knowledge for different reports. The knowledge shared reflected on world views (the way the community views the world), cultural values and activities, and how they have

been and continue to be affected by effects to the surrounding environment.

The WOLF is a cultural methodological framework that will help in assessing cumulative, project-specific and policy driven impacts to rights and culture, and for use in all general and consultation activities.

This framework can be used to consider potential impacts to rights and culture and way of life, but also considering existing and future cumulative impacts. It can also help the community determine where community investment could take place to increase resiliency and the community ability to absorb and respond to the effects.

The outermost ring reflects the rights, then the social-ecological system requirements, cultural components, values, and the inner core reflects the cultural worldview of the FCMN.

The inner core or worldview is governed by natural laws and respect for Mother and Earth and the Creator. These laws and fundamental understandings and are reflected in beliefs, customs, and protocols. We have used the adage “Healthy Land, Healthy People” which is a statement from Big Ray that best reflects the core values.

The reason we are introducing this concept here is to simply say that the FCMN reviews all impacts to rights through the lens of culture and way of life. We do intend to also use this process throughout the work of the action plan.



Fig. 5: *These eight rights domains are based on the work of the Indigenous Navigator, who organized the 46 articles of UNDRIP into 13 categories (i.e. domains). IEGs recent work in the region, suggests these 8 domaines are most relevant/directly applicable to the communities in NE Alberta.” (pers. comm Erika Bockstael, June 01, 2022)

Chart: Fort Chipewyan Metis Nation

Major Progress and a Remaining Threat for the Protection of the Grand Canyon

Günter Wippel, uranium network



The Grand Canyon World Heritage Site in the USA is at risk due to mining activities in its vicinity. We reported about the risks to the site through uranium mining in WHW-Report 2018 (page 48 – 51) and in the 2020 Report (page 58 – 61).

Latest Developments

Arizona representatives tried twice to get further protection for the Grand Canyon area through US laws; twice, in 2009 and in 2020 they introduced protective legislation, the Grand Canyon

Centennial Protection Act. Twice, the law was adopted by the House of Representatives, but blocked in the Senate resp. in Senate Subcommittees, the second time in 2022.¹

In August 2023, US President Joe Biden declared three distinct areas adjacent to the Grand Canyon National Park and the World Heritage Site National Monument, the “Baaj Nwaavjo I’tah Kukveni – Ancestral Footprints of the Grand Canyon National Monument”.² The National Monument does not allow the licensing of new mines on its territories. According to the

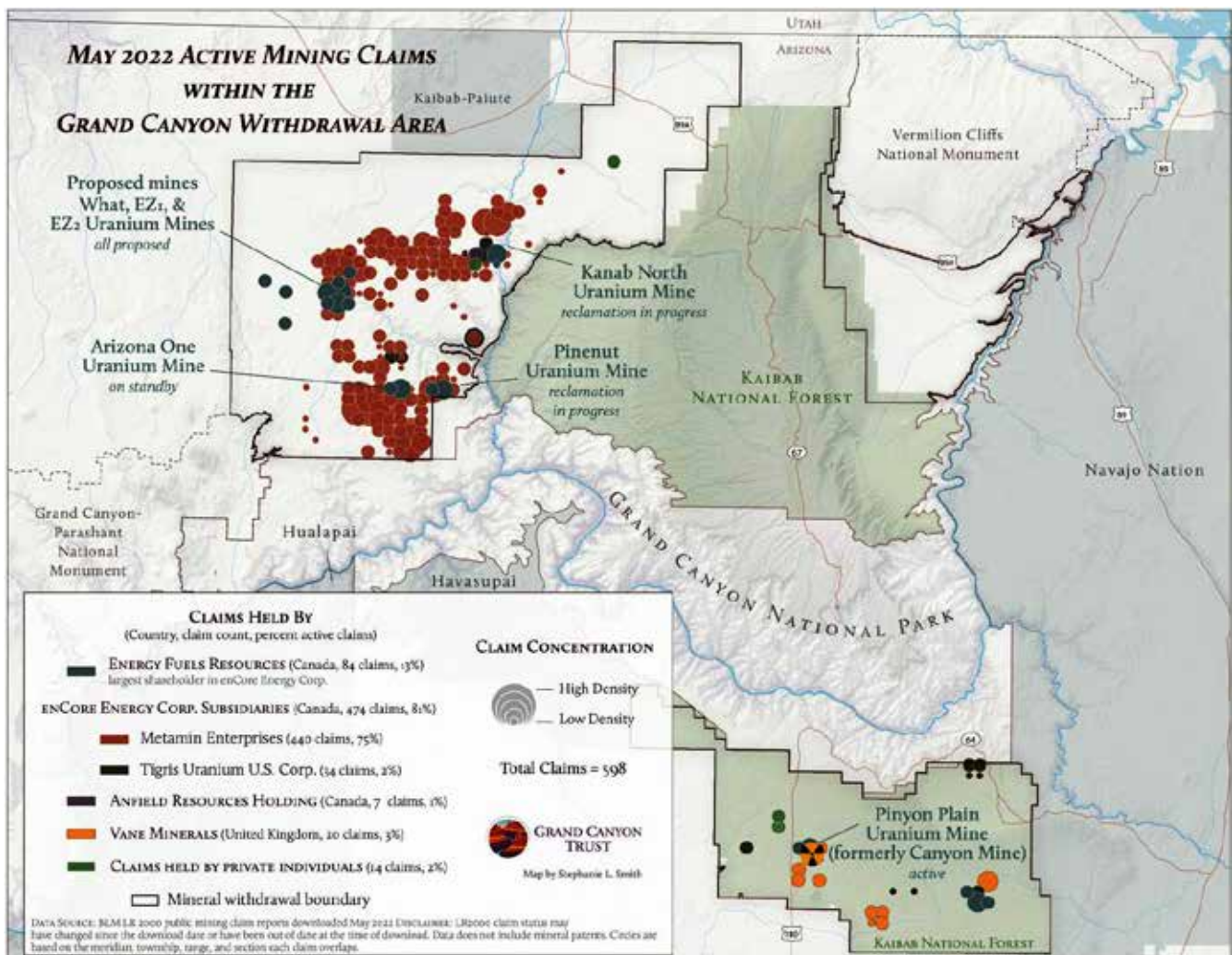


Fig. 1: Uranium mining claims as of May 2022 in the former Grand Canyon Withdrawal Area whose boundaries coincide with the newly-created National Monument.

Map: Stephanie Smith / Grand Canyon Trust

White House, “Existing mining claims – predating a 20-year mineral withdraw initiated in 2012 – will remain in place, and the two approved mining operations within the boundaries of the monument would be able to operate”.³ A mining claim secures only the ownership of the property; mining permits, which are needed for a mine to become operational, will not be issued anymore.

The most imminent danger to this World Heritage site poses a uranium mine (Pinyon Plain Mine, formerly named Canyon Mine) at the south rim of the Canyon, south of the southern border of the Grand Canyon National Park. The mine is inside the National Monument area. Since the declaration of the National Monument by the US President does not erase older rights, i.e. the mining company Energy Fuels Inc. retains the right to mine the deposit.

In December 2023, Energy Fuels Inc. started ventilating the mine shaft, and began extracting uranium ore in January 2024.

The Havasupai Tribe, whose reservation – in a side canyon of the Grand Canyon – is located basically downstream from the mine and whose sacred mountain, Red Butte, is in its immediate vicinity, have opposed it for decades. The tribe informed the public about the renewed activity of the mine on January 11, 2024.⁴ Days later, January 15, 2024, many Native American tribes condemned the start of mining activities; the President of the Navajo Nation as well as the Havasupai Tribal Council opposed the mining activities.⁵ By Jan. 31, 2024, more than 80 NGOs, Indigenous nations and faith groups called on US President Biden and Arizona Governor Katie Hobbs to close Pinyon Plain Mine.⁶

Mining puts Grand Canyon WHS at risk of radioactive contamination

The movement of water in the aquifers of the area is not very well understood. Thus, mining in the vicinity of the Grand Canyon poses an incalculable risk to the World Heritage Site (see previous WHW Reports).

An in-depth study by the US Geological Service (USGS) from 2021 (published after the most recent report on the site by WHW) states, after, among other things, analyzing 573 samples: “While no conclusive effects from breccia-pipe mining activities on uranium concentrations in groundwater samples collected to date (2021) in the Grand Canyon region can be confirmed (...), the timing of potential effects may take many years to reach groundwater discharge

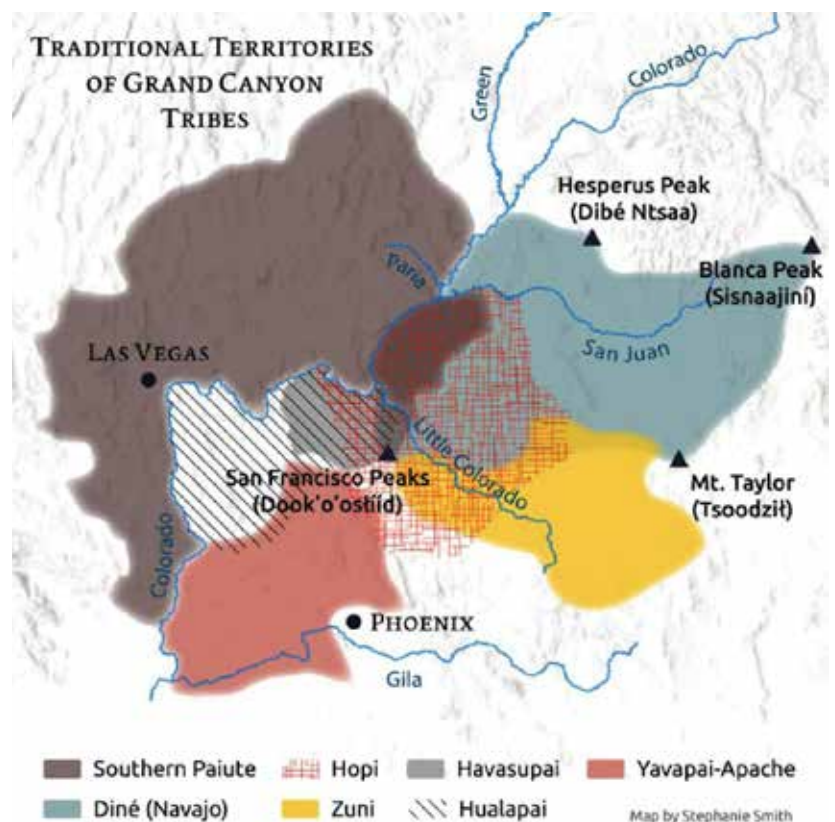
locations. The establishment of baseline groundwater quality is an important first step in monitoring for change in water chemistry throughout the mining lifecycle and beyond to ensure the health of these critical groundwater resources.”⁷

In other words, if mining activities should cause contamination of the aquifers, it may take years up to decades to show up – too late to stop the source of contamination (the mine).

Note that there will be no way to reverse the contamination. The study also says explicitly that collecting groundwater samples is only a first step to monitor groundwater quality, i.e. one is still far away from understanding the movements of water underground. In a situation of such insecurity, the precautionary principle commands **not** to risk contamination, especially since contamination will be irreversible and will reach WHS Grand Canyon at some time.

The Havasupai perspective in a new framework conceptualization

To strengthen their position, the Havasupai Tribe co-produced a report with the United States Geological Survey (USGS) in order to identify exposure pathways posed by uranium mining in the



The Tribes' traditional territories reflect past archaeological and ethno-historic work. These areas rely on the best data to date but are provisional and have the inherent limitation of imposing lines on a fluid and evolving subject.

Fig.2: Traditional territories of Grand Canyon Tribes including the Havasupai.

Source: Krakoff, S. (2020), Not yet America's best idea—Law, inequality, and Grand Canyon National Park: University of Colorado Law Review, v. 91, no. 2, p. 560–648.

Grand Canyon watershed that arise from traditional uses and cultural values placed on resources. Previous models did not take into account such tribal perspectives. "... these risk models lack the Tribal or indigenous knowledge as seen by recent research opportunities from the U.S. Environmental Protection Agency to expand inclusion of indigenous perspectives into environmental health research (for example, U.S. Environmental Protection Agency, 2023a, 2023b). This deviation from equitable co-existence between humans and nonhuman beings is inconsistent with foundational understanding of many indigenous cultures"

The report, titled "Expanded Conceptual Risk Framework for Uranium Mining in Grand Canyon Watershed—Inclusion of the Havasupai Tribe Perspective",⁸ identified new exposure pathways for the Havasupai such as inhalation, ingestion and absorption from traditional food and medicines as well as ceremonial practices. "The Havasupai Tribe's perspective must be included in any risk models analyzing the Grand Canyon watershed. To keep it out would produce results that are not accurate", said Armando Marshall, Vice-Chairman of the Havasupai Tribe, when the report was published on 30 January 2024.⁹

UNESCO has long emphasized the cultural significance of the wider Grand Canyon region, stating in its Brief Synthesis of the OUV: "Management of the Outstanding Universal Value of the property is undertaken alongside close attention to the park's important cultural heritage ... This ancestral tie to the park and the land is manifest in the recognition of traditional association with at least 11 federally recognized American Indian tribes including the Havasupai, Hualapai, Hopi, Navajo, Southern Paiute, and Zuni".¹⁰

The Problem of uranium ore transportation from mine to mill

The uranium ore extracted from the Pinyon Plain mine cannot be processed on site due to the lack of a uranium mill. Its construction – which would include tailings facilities and tailings ponds – would certainly not be licensed. As a result, the mined uranium ore is held at an interim storage facility at the mine site (as of May 2024) and will be transported by trucks to the company's White Mesa Mill in Blanding / Utah, approx. 400km away.

The route leads for its most part through the Navajo Indian Reservation. The Navajo Nation however, has passed legislation which bans all uranium mining and processing on the Navajo Reservation in 2005 (Dine Natural Resources Protection Act),¹¹ and on January 15, 2024, Navajo president Buu Nygren warned that "transporting uranium will occur through several Navajo communities in violation of tribal law." Although tribal law does not apply on Interstate Highways, which are under federal jurisdiction, "the president [of the Navajo Nation] says he's looking at options to stop transport through the Navajo Nation."¹²



Fig. 3: If uranium mining will proceed at the Pinyon Plain mine as planned, large uranium haul trucks covered only in canvas tarps will soon pass through the Navajo Indian Reservation, creating a risk for public health and safety including possibly in the Grand Canyon National Park. Photo: Blake McCord

The on-site storage and transport of uranium ore leads to additional risks: dust may be blown away into the surroundings, the ore exhales radioactive radon gas which travels with the wind, contaminated water can seep into the ground. Flash floods – now frequent in the region – may wash radioactive ore away and dispose it "downhill" – into the Grand Canyon WHS.

Several planned dams will not materialize

After years of advocacy by Native communities, tribes, the Grand Canyon Trust, and others, in 2022, the federal government cancelled preliminary permits it had issued to a Phoenix-based company for two proposed hydroelectric projects on Navajo Nation lands mere miles from the national park boundary. Both would have flooded a pristine section of the Little Colorado River Gorge, muddied its distinctive turquoise-blue waters, destroyed areas sacred to Native peoples, and threatened the habitat of the already endangered humpback chub.

In April 2024, following a new federal policy requiring tribal consent for dams on tribal lands, the government denied the company's third application to dam Big Canyon, a nearby tributary canyon adjacent to the Little Colorado River.¹³

An opportunity for a Buffer Zone

The establishment of the "Ancestral Footprints of the Grand Canyon National Monument", and the scrapped plans for constructing dams near the Grand Canyon opens up the possibility to declare a buffer zone around the Grand Canyon National Park, as requested for all World Heritage properties, since it is now fully enclosed by areas of special regime as Fig. 4 shows. Of course, this would be possible only with the Free Prior Informed Consent (FPIC) and full cooperation of the tribal nations affected.

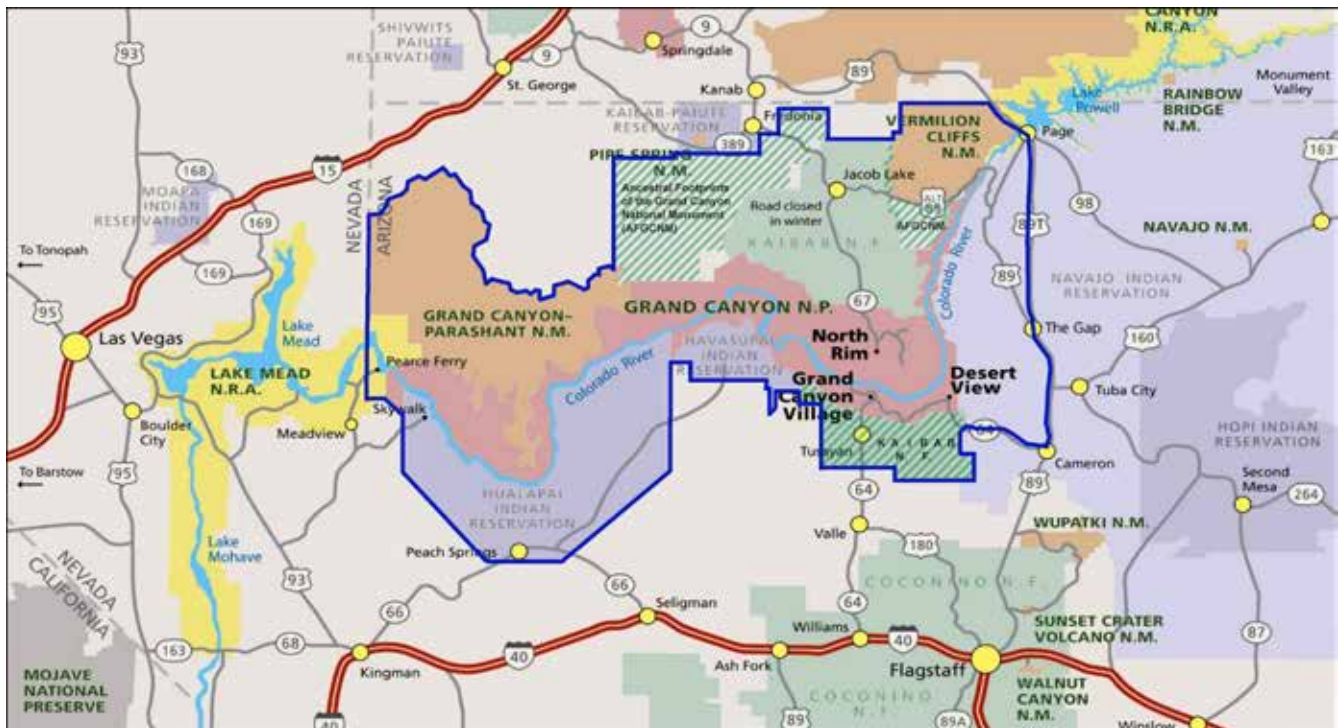


Fig. 4: Map of the Grand Canyon National Park and World Heritage Site surrounded by other areas of special regime. The blue line suggests the outer boundaries of a potential buffer zone. Map: Martin Lenk / World Heritage Watch

Recommendations

The World Heritage Committee should encourage the State Party of the United States, in full cooperation with the affected tribal nations and respecting their right to Free Prior Informed Consent,

- to establish a formal buffer zone for the Grand Canyon National Park; and
- to nominate the Grand Canyon NP for inscription also under cultural criteria iii, v and vi.

Notes

- <https://www.grandcanyontrust.org/advocatemag/fall-winter-2022/grand-canyon-protection-act>
- <https://www.whitehouse.gov/briefing-room/statements-releases/2023/08/08/fact-sheet-president-biden-designates-baaj-nwaavjo-itah-kukveni-ancestral-footprints-of-the-grand-canyon-national-monument/>
Video: www.youtube.com/watch?v=3kooBdXto04&t=211s
- <https://www.whitehouse.gov/briefing-room/statements-releases/2023/08/08/fact-sheet-president-biden-designates-baaj-nwaavjo-itah-kukveni-ancestral-footprints-of-the-grand-canyon-national-monument/>
- <https://hualno.com/2024/01/12/hasavupai-issue-statement-the-threat-is-real/>
- Arizona Daily Sun "Tribes condemn start of uranium mining at Pinyon Plain Mine south of Grand Canyon", Jan 13, 2024
https://azdailysun.com/news/local/tribes-condemn-start-of-uranium-mining-at-pinyon-plain-mine-south-of-grand-canyon/article_13efb3b0-b16a-11ee-973a-c789810e105e.html
- Advocates demand halt to uranium mine near the Grand Canyon, January 31, 2024: www.salon.com/2024/01/31/advocates-demand-halt-to-uranium-mine-near-the-grand-canyon
- "An assessment of uranium in groundwater in the Grand Canyon region" by Fred D Tillman, Kimberly R. Beisner, Jessica R. Anderson & Joel A. Unema, <https://www.nature.com/articles/s41598-021-01621-8>, (bolds not in the original)
- Tilousi, C., and Hinck, J.E., 2024, Expanded conceptual risk framework for uranium mining in Grand Canyon watershed—Inclusion of the Havasupai Tribe perspective (ver. 1.1, February 2024): U.S. Geological Survey Open-File Report 2023–1092, 25 p., <https://doi.org/10.3133/ofr20231092>
- <https://www.usgs.gov/news/national-news-release/usgs-partners-havasupai-tribe-identify-potential-contaminant-exposure>
- <https://whc.unesco.org/en/list/75>
- www.earthisland.org/journal/index.php/magazine/entry/navajos_ban_uranium_mining/
<https://fronterasdesk.org/content/1868202/navajo-president-warns-uranium-transport-tribal-lands>
- <https://www.knau.org/knau-and-arizona-news/2024-02-05/navajo-nation-resisting-the-hauling-of-uranium-ore-through-reservation>
- <https://www.grandcanyontrust.org/little-colorado-river-dam-proposals>

Continued Request to Inscribe El Pinacate on the List of World Heritage in Danger

Alejandro Olivera, Center for Biological Diversity



Mexico's El Pinacate and Gran Desierto de Altar Biosphere Reserve World Heritage property ("El Pinacate") was inscribed on the World Heritage List in 2013,¹ in part, to protect the area's extraordinary "biodiversity and threatened species." This diversity includes numerous species of imperiled wildlife that depend on cross-border connectivity, like imperiled Sonoran pronghorn, bighorn sheep, pygmy owl, and jaguar. El Pinacate's roughly 140-kilometer northern boundary abuts the Mexico – United States border, and the U.S. border areas have been deemed critical to El Pinacate's "integrity and ecological connectivity" and to the survival and recovery of many Sonoran species.

During the Trump administration (2017– 2021), the United States completed 730 km of border wall^{2,3} along the Mexico-U.S. border. The wall now runs along almost the entire length of Pinacate's northern border, leaving just 23 km in the mountains without a barrier (Fig. 1).⁴ This 9-meter-high wall blocks critical wildlife migration in and out of this unique protected habitat and endangers the area's connectivity and integrity. (See video from the U.S. side to El Pinacate: <http://t.ly/XkCu>).

To build the wall, many areas along the border were blasted with dynamite including an Indigenous burial ground and sacred site at Organ Pipe Cactus National Monument⁵ and the Tinajas Altas Mountains on the Cabeza Prieta National Wildlife Refuge (Fig. 2) (see drone footage: shorturl.at/agtNV).

In 2017, the Center for Biological Diversity, Greenpeace Mexico and the Tohono O'odham Tribe in Sonora petitioned for "in danger" status for El Pinacate threatened by the U.S. border wall.⁶

In 2021, the World Heritage Committee urged (Decision 44 COM 7B.114) the United States to stop border wall construction. The Committee stated that the construction of the border wall will negatively impact the integrity of El Pinacate and affect the wider ecological connectivity and movement of key wildlife populations. The Committee also called on the United States to work with Mexico to assess damage from the wall to El Pinacate and adjacent protected lands in the United States and recommend ways to restore the landscape and wildlife habitat.⁷



Fig. 1: New border wall (red line) built 2017-2021.

Modified from Sky Islands Alliance



Fig. 2: Wall construction in the Tinajas Altas Mountains.

Photo: Russ McSpadden / Center for Biological Diversity



Fig. 3: A mule deer found dead along the border wall.

Photo: Laiken Jordahl / Center for Biological Diversity

Mexico's 2023 State of Conservation Report (SOC) states that the border wall will "inevitably have effects on regional biodiversity due to loss, degradation and habitat fragmentation, less access to vital resources and habitat, isolation and fragmentation of populations, conduct changes of certain species in response to moving activity on roads, increased human activity and alteration of the social structure of populations, among other aspects." Mexico concluded that "the construction of a barrier that prevents the free movement of wildlife is a threat" and has "significant impacts on the habitat conditions."⁸

The Mexican government has also recognized that the main environmental impact of the border wall is "connectivity and the effect it will have on biodiversity ... especially in animals such as pronghorn and bighorn sheep that have a long-life history."⁹ Populations of flat-tail horned lizard, Yuma fringe-toed lizard, Quitobaquito pupfish, Sonoyta mud turtle, lesser long-nose and fish-eating bats, Goode's horned lizard, mountain lion, Sonoran pronghorn, coyotes, Mexican bighorn sheep, Sonoran desert tortoise, and mule deer, jaguars, and even low-flying owls must be evaluated and monitored^{10,11} due to the border wall impacts (Fig. 3). Water reservoirs and oases have been divided and become inaccessible to fauna in the Pinate side; Quitobaquito Spring now is now unreachable from Mexico. See video: http://t.ly/EB_6

The Trump administration also installed high-intensity stadium lights along the wall that, if made operational, have the potential to cause severe light pollution impacting animal migration routes and wildlife. A report¹² details the installation of at least 1,800 currently-inoperable stadium lights across around 100 km of protected lands on the Arizona border, including Cabeza Prieta National Wildlife Refuge and Organ Pipe Cactus National Monument that abut El Pinacate. Border lights already threaten migratory birds, nocturnal pollinators and habitat for dozens of endangered species in all four border states.

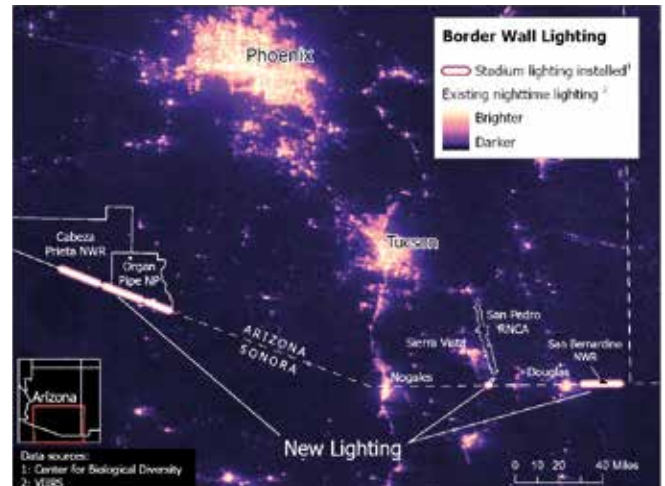


Fig. 4: A map of the border wall lighting infrastructure at Organ Pipe Cactus National Monument, San Pedro River National Conservation Area, Cabeza Prieta National Wildlife Refuge, San Bernardino Valley, and San Bernardino National Wildlife Refuge.

Image: Curt Bradley/Center for Biological Diversity

As a result of a legal settlement over U.S.-Mexico border wall funding, a few, small fauna passages will be opened in the wall. The legal agreement specifies that an opening with a minimum length of 18 feet will be installed in the Cabeza Prieta National Wildlife Refuge,¹³ though it is unclear whether this opening will be in the portion of the wall that abuts El Pinacate. While these few openings may help certain individual animals make it through the border wall, the passages are inadequate to address the profound, landscape-scale severance of connectivity the border wall has caused throughout the region.

Moreover, U.S. Customs and Border Protection is "closing small gaps" in the border wall and continuing to fragment the few remaining wildlife corridors between Arizona and Sonora. Customs and Border Protection has failed to describe how many gaps will be closed, where these gaps are and how much new wall will be built. Some of the last remaining border wall gaps

are within ranges of endangered animals like Peninsular bighorn sheep, jaguars and Mexican gray wolves.¹⁴

Beyond jeopardizing wildlife, endangered species and public lands, the U.S.-Mexico border wall is part of a larger strategy of ongoing border militarization that damages human rights, civil liberties, native lands, local businesses and international relations. The border wall impedes the natural migrations of people and wildlife that are essential to healthy diversity.

Despite the Committee's request in Decision 44 COM 7B.14 to cease all further border wall construction, construction continues without an assessment of the potential impacts on the OUV. In Decision 45 COM 7B.2, the Committee expressed concern that the border wall now stretches along almost the entire boundary between the property.¹⁵ The Committee requested that the United States "develop, resource and implement in cooperation with the State Party of Mexico an urgent action plan to assess and mitigate impacts of the border wall to the property and restore the connectivity." It further stated that "if ecological connectivity is not restored to safeguard the viability of key populations, the property may meet the conditions for inscription on the List of World Heritage in Danger."¹⁶

The Center for Biological Diversity strongly urges Committee Members to request a monitoring mission to evaluate the Site to assess impacts and to:

1. Continue to request a joint report from the United States and Mexico regarding the Site, the wall, construction progress, and its effects on El Pinacate, including particularly population studies on affected wildlife, including the Sonoran pronghorn, Mexican bighorn sheep, and Sonoran Desert tortoise;
2. Call on the US government to remove border security lighting affecting the Property;
3. Request that the U.S. government remove the border wall along El Pinacate to allow the wildlife connectivity; and
4. Inscribe the El Pinacate property on the List of World Heritage in Danger at the Committee's 46th Session.

Notes

- 1 World Heritage Committee Decision 37 COM 8B.16, Decisions Adopted by the World Heritage Committee at its 37th Session (Phnom Penh, 2013), WHC-13/37.COM/20, Paris, 5 July 2013 ("WHC Decision 37 COM 8B.16"). Available at: <http://whc.unesco.org/en/list/1410/documents/>.
- 2 DHS and CBP Celebrate 400 Miles of New Border Wall System Release Date: October 29, 2020. Available at: <https://www.dhs.gov/news/2020/10/29/dhs-and-cbp-celebrate-400-miles-new-border-wall-system>
- 3 Sky Island Alliance. <https://skyislandalliance.org/our-work/us-mexico-border-wall/tour-the-border/>
- 4 Id.
- 5 NBC News. Ancient Native American burial site blasted for Trump border wall construction. Erik Ortiz. 12 February 2020. <https://www.nbcnews.com/news/us-news/ancient-native-american-burial-site-blasted-trump-border-wall-construction-n1135906>
- 6 Petition to include the El Pinacate and Gran Desierto de Altar Biosphere Reserve World Heritage site on the list of World Heritage in Danger. May 23, 2017. Available at: https://www.biologicaldiversity.org/programs/international/borderlands_and_boundary_waters/pdfs/Pinacate_WH_In_Danger_Petition_5_23_17.pdf
- 7 Decision 44 COM 7B.114. El Pinacate and Gran Desierto de Altar Biosphere Reserve (Mexico) (N 1410). <https://whc.unesco.org/en/decisions/7829>
- 8 State of Conservation Report of the World Heritage Property "El Pinacate y Gran Desierto de Altar Biosphere Reserve" (Mexico-1410). February 1st, 2022
- 9 Id.
- 10 Id.
- 11 El Pinacate and Gran Desierto de Altar Biosphere Reserve - 2020 Conservation Outlook Assessment. available at: <https://worldheritageoutlook.iucn.org/es/explore-sites/wdpaid/555556046>
- 12 a wall of lights through the Wild. Russ McSpadden, Laiken Jordahl and Curt Bradley Center for Biological Diversity, June 2023 1,800 Stadium Lights on Arizona Conservation Lands Threaten Wildlife. Available at: https://www.biologicaldiversity.org/campaigns/border_wall/pdfs/border-lighting-wildlife-impacts-2023-05-06.pdf
- 13 Openings for wildlife will be installed in areas of U.S.-Mexico border wall Howard Fischer, Capitol Media Services/July 18, 2023// Available at: <https://azcapitoltimes.com/news/2023/07/18/openings-for-wildlife-will-be-installed-in-areas-of-u-s-mexico-border-wall/>
- 14 Comments on Border Barrier Remediation – San Diego and Imperial Counties, CA; Yuma County, AZ; and Hidalgo and Luna Counties, NM. Available at: https://www.biologicaldiversity.org/campaigns/border_wall/pdfs/Wall-remediation-comments-June-2023.pdf
- 15 Decision 45 COM 7B.2
- 16 Id.

Canaima National Park: Rising Threats and no Response from the Venezuelan State

SOS Orinoco



Canaima National Park, declared a World Heritage Site in 1994, protects about 3,000,000 ha of land that include very humid tropical evergreen lowland and montane forests, savannahs, grasslands and shrublands, vast areas of high plateaus, *tepuis*, wetlands, the headwaters of the Caroní River, an immense diversity of plants, vertebrates, and invertebrates, as well as a

large number of endemic fish species. All this rich biodiversity is unique to the Guiana Shield, and is part of the Greater Amazon in a broad sense.

Since 2018, SOSOrinoco has been documenting and monitoring the increasing pressures and threats on the conservation

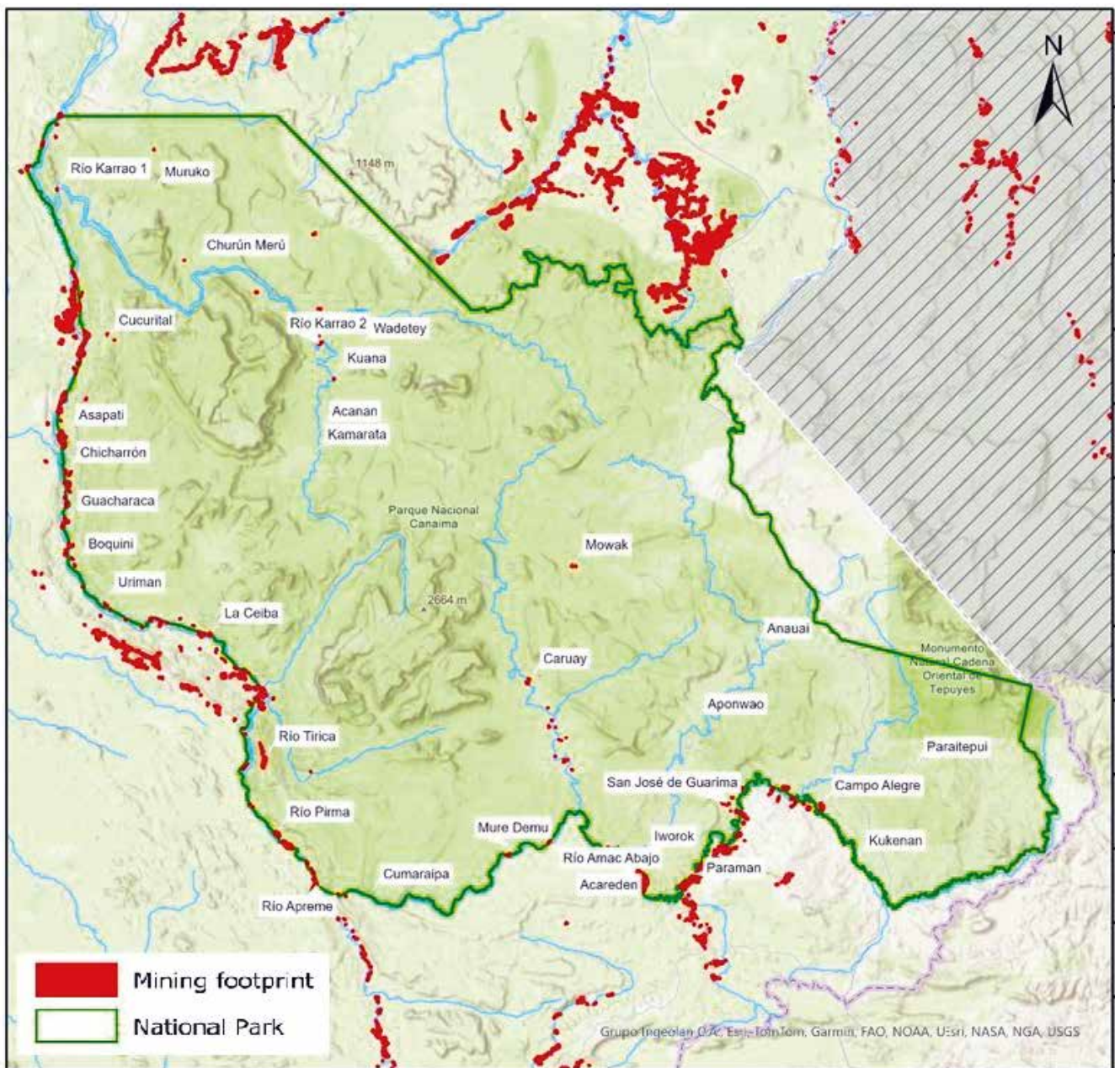


Fig. 1: Mining footprint inside and outside Canaima National Park, updated to 2023.

Map: SOSOrinoco

values of the World Heritage Site (Fig. 1) and has submitted for four consecutive years reports to World Heritage Watch to provide first-hand information to the UNESCO World Heritage Committee, thus contributing to the final implementation of sustainable management of Canaima's biodiversity to guarantee their environmental services to present and future generations.

This new participation at the WHW is relevant according to the following facts:

- Illegal mining has not ceased to increase and there have been no effective measures by the authorities to stop it (Fig. 2). Also, the Venezuelan State hasn't provided further information to the World Heritage Centre on the current ex-

tent and status of illegal mining activities in the property, per the request of Decision 44 COM 7B.199.

- There is no effective administration on the ground by In-parques (the Venezuelan official national park management entity) or any other governmental authority, to manage this site positively and effectively under the standards required by UNESCO. The capacity and effectiveness of the park ranger's corps is an essential aspect that must be addressed in the inspection.
- The State Party did not issue a new invitation for the Reactive Monitoring Mission after its postponement allegedly due to weather conditions. The commission has been waiting for two years to visit Canaima.



Fig. 2: Example of a mine expansion in the year 2023, along the limits and buffer zone of Canaima National Park (spatial coordinates in brackets).

Source: SOSOrinoco/Planet



Fig. 3a-d: Mining dredges in the Arekuna-Canaima river port axis, along the Caroní River (December 2013). Source: @Fritz_A_Sanchez (social network X)

Current facts

- In December 2023, it was reported that ten illegal dredges (mining rafts) were operating in the Arekuna - Canaima river port, on the Caroní River axis (Fig. 3), which is the de facto buffer zone of the Site, causing contamination and destruction of riverbeds. Each dredge consumes approximately 800 liters of fuel per day. The distribution and sale of fuel are controlled by the Bolivarian National Armed Forces. This Caroní river is the western boundary of the World Heritage

Site. There is unconfirmed news that mining dredges are also operating well within the national park.

- 1,500 hectares are being affected by mining activity within the limits of the National Park and 1,350 hectares in its surrounding areas (within 10 kilometers of the legal limits of the property), which should be considered as a buffer zone. This buffer zone has undergone a mining expansion of 165 ha between 2022 and 2023 (Fig. 4).

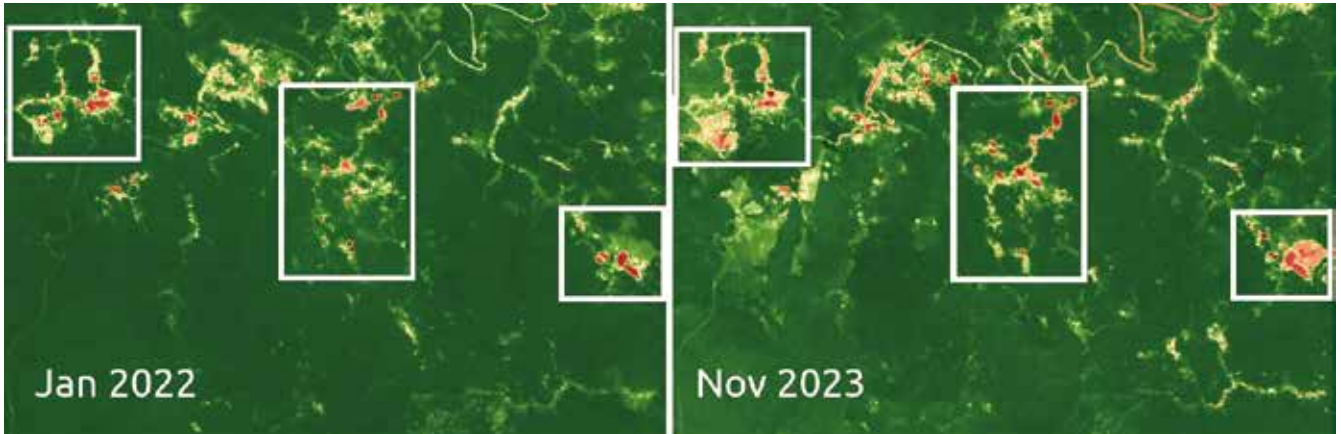


Fig. 4: Expansion of mining activity (yellow and red) in the adjoining areas of Canaima National Park (Lat 6.0837 N, Lon 61.5504 W) from January 2022 to November 2023. Data obtained from Planet Imagery 2024. Images: SOSOrinoco

- Gold mining activities continue to use and trade mercury, a substance banned by Venezuelan law.
- Authorities are reportedly using exotic species such as vetiver (*Chrysopogon* sp.), a potentially invasive species, to restore vegetation cover, endangering local biota.
- INPARQUES authorities do not monitor or control the tourist activities of hotels and tour operators. The park's regulations are constantly violated by inappropriate constructions, proposals, and massive events, where there is obvious noise pollution (non-compliance with the permitted sound decibels) and the use of excessive, unauthorized artificial lighting, which has a potential negative impact on the fauna. There is also circumstantial evidence of the relationship between two large hotels (Ara Merú and WakaWená) as facilitators of illegal mining activities.
- Members of the Pemón indigenous community actively participate in mining activities as a response to the lack of government social assistance and economic support. This participation in an illegal activity has negative social consequences, such as displacement, cultural erosion, human rights violations, and internal conflicts that affect the governance of the territory.
- Fire, identified as one of the main threats to the ecosystems of this World Heritage Site, has burned 38,483 hectares of the Site in just two months, March and April 2024 (see Fig. 5). This shows a lack of effective fire prevention and control management, as well as its misuse by local residents, all of which has produced unprecedented burning. Between 2014 and 2016, the forest fire control program that operated for Canaima was practically dismantled, and was replaced by another one run by INPARQUES, Civil Defense and the National Armed Forces, presenting obvious drawbacks in its application.

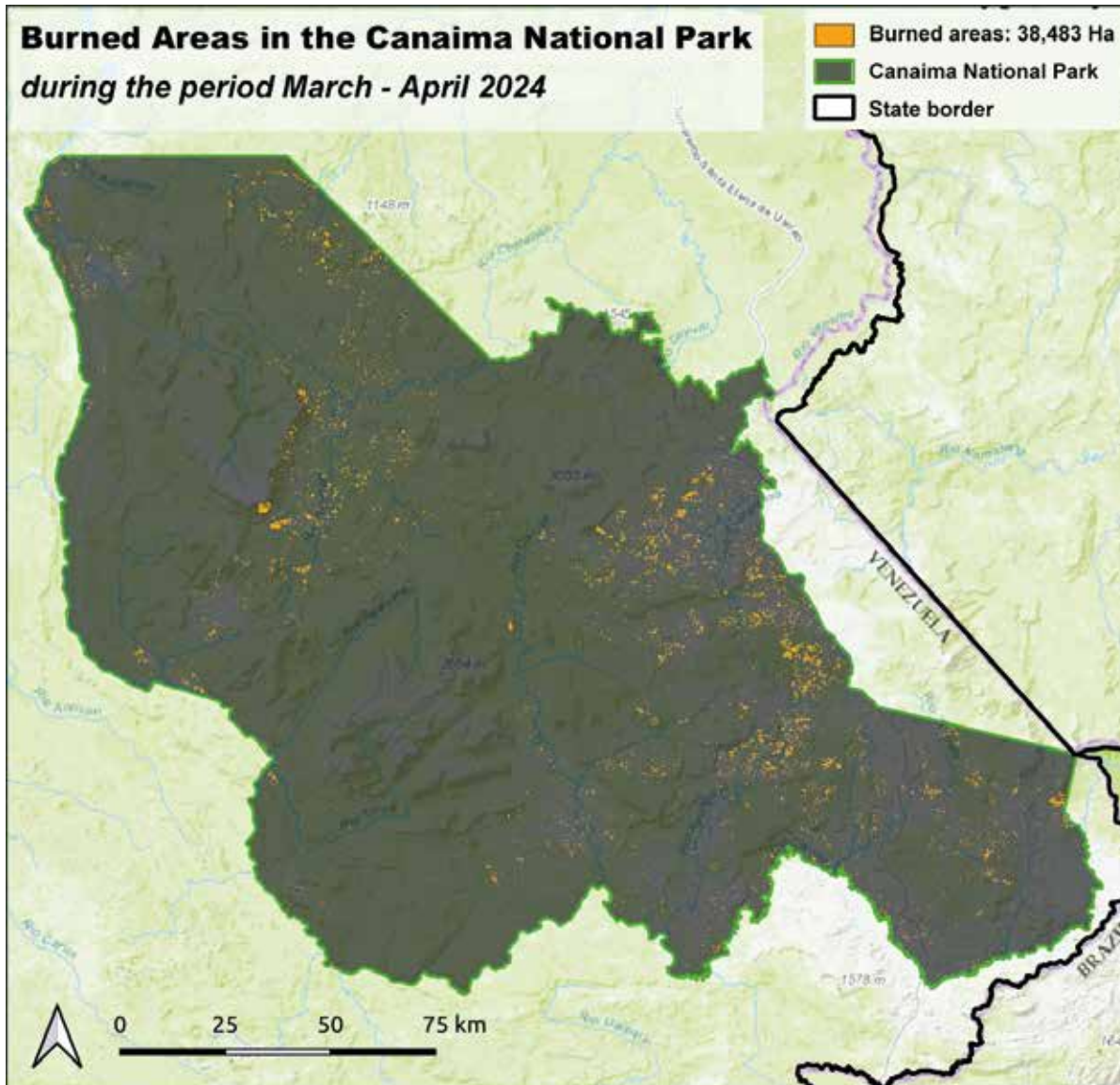


Fig. 5: Cumulative burned area of Canaima National Park in March and April 2024, estimated with Landsat 8 and 9 images, calculating the difference in the NBR index between December-January 2023 and March-April 2024 (pixels with differences of value greater than 0.1). Map: SOSOrinoco

Conclusion

The biological and cultural values of Canaima National Park are threatened and continue to be impacted by illegal mining activities. In addition, there is no effective park ranger corps, nor is it equipped with the minimum necessary equipment to carry out vigilance and control duties in a park of more than 3 million hectares. Unrestricted tourism activity is perceived as a significant threat to certain features of this World Heritage Site.

UNESCO must make its own first-hand, on-the-ground assessment of the reality of the site, without intermediaries or political interference, in order to fulfill the spirit of the World Heritage Convention for the benefit of humanity and the people of Venezuela. The objective and technical expertise of the Reactive Monitoring Mission is urgently needed to analyze the situation and work with the State to start finding solutions.

References

- Sánchez, F. 2023. Devastación Total https://twitter.com/Fritz_A_Sanchez/status/1741210361615843538?s=20
- SOSOrinoco. 2018. Illegal Gold Mining in Canaima National Park (World Heritage Site). July 2018. Download at: <https://tinyurl.com/32kbyw8k>
- SOSOrinoco 2020a. Update | Current Gold Mining Situation in 2020 at Canaima National Park, A World Heritage Site in Venezuela. March 2020. Download at: <https://tinyurl.com/mr3m5a3t>
- SOS Orinoco. 2020b. Canaima National Park: The Fabled "Lost World" Endangered by a Gold Rush. Page 68. In: World Heritage Watch: World Heritage Watch Report 2020. Berlin 2020 (188 pages, with 235 photos and 70 graphics and maps. Published by World Heritage Watch e.V. Berlin 2020. ISBN 978-3-00-065879-2)
- SOS Orinoco 2021. Canaima National Park: Relentless Mining on the Rise. Page 154. In: World Heritage Watch: World Heritage Watch Report 2021. Berlin 2021 (228 pages, with 240 photos, 30 graphics and 84 maps. Published by World Heritage Watch e.V. Berlin 2021. ISBN ISBN 978-3-00-069191-1)
- SOS Orinoco. 2022. Update on the Situation of Gold Mining in Canaima National Park, Venezuela. Page 87. In: World Heritage Watch: World Heritage Watch Report 2022. Berlin 2022 (248 pages with 341 photos, 30 graphics and 96 maps. Published by World Heritage Watch e.V. Berlin 2022. ISBN 978-3-00-073805-0)
- Unesco. 2023. Decisions adopted during the extended 45th session WHC/23/45.COM/19, p. 198

Statement on Lake Bogoria from the Endorois Indigenous People of Kenya



Endorois Welfare Council

This is a statement from the Endorois Welfare Council, which represents the Endorois Indigenous People from Lake Bogoria in Kenya. The Council was established to seek restitution of the Endorois People's land seized by the Government of Kenya in 1973 to create the Lake Bogoria National Game Reserve. The resulting loss of access to ancestral lands and natural resources has had severe impacts on the economic, cultural, religious, and social rights of the Endorois. In 2009 the African Commission on Human and Peoples' Rights passed a landmark ruling in favor of the Endorois asking Kenya to reconstitute Endorois ancestral lands.

The Endorois Welfare Council welcomes the important work done by UNESCO and the World Heritage Committee in protecting World Heritage sites.

Concerning the conservation and management of Lake Bogoria as UNESCO World heritage and Ramsar sites, the Council makes the following observations:

The Endorois community reports that the Lake Bogoria water levels have increased again due to heavy rains witnessed recently, and PH levels decreased, leading to decreased populations of Lesser Flamingo.

- The Endorois community notes with appreciation the development of the Lake Bogoria Management Plan, which was a joint work between the community, Baringo County, and Kenya Wildlife Services.
- However, the community is worried that poor governance and management of Lake Bogoria National Reserve by the Baringo County government, in exclusion of the Endorois, has led to encroachment by unauthorized charcoal dealers, destroying the wildlife habitat and leading to biodiversity loss within the conservation area.
- The Endorois reject the way the Lake Bogoria Management Plan is being implemented in exclusion of the Endorois Welfare Council and the Endorois people at large.
- The Council would like the Baringo County government to form a joint management committee of the Lake Bogoria National Reserve, as proposed in the Lake Bogoria Management Plan 2019-2029, to implement the resolutions of the management plan.

- The Council also proposes that the Endorois people displaced by the rising water levels from Lake Bogoria – 48 households with a population of over 500 people – be compensated for their lands, houses and any other movables which were lost during the displacement period.
- The state of Lake Bogoria World Heritage site, in terms of infrastructure development, management and conservation is at its lowest and requires the international community to intervene and provide support in terms of technical, financial and ecological expertise in the conservation of the international property.
- The Endorois indigenous knowledge on the management of this resource has been ignored, and requires the reintroduction of traditional and cultural management to enable Lake Bogoria to be brought back to its original situation, as before it was taken over by the government of Kenya in 1973.
- The Endorois call upon the World Heritage Committee to direct the Baringo County Government and the Government of Kenya to respect the ruling of the African Commission on Human and Peoples' Rights in the Endorois case.¹

We sincerely look forward to an amicable solution this dispute, which has persisted for over four decades.

¹ Decision on Communication No. 276/2003 - Centre for Minority Rights Development (Kenya) and Minority Rights Group International on behalf of Endorois Welfare Council v Kenya.

Update on the Eviction of the Maasai Population from the Ngorongoro Conservation Area

Anonymous author



Fig. 1: Maasai graze their cattle together with Zebras in the Ngorongoro Conservation Area.

Photo: Guiziou Franck/Hemis/Alamy

Since the last update from March 2023, the situation of the Maasai in the Ngorongoro Conservation Area (NCA) has worsened continuously. The Government of Tanzania has not changed course but has increased its activities towards the full implementing of its plan to evict the Maasai population from the Multiple Land-Use Area which is legally recognized by national and international law, procedures and framework. Indeed, it seems that the eviction of Maasai is ongoing from many other areas in Tanzania, and thus not a problem only in Ngorongoro.

Harassment is continuous and worsening. Examples are a recent move not to let Maasai return to the NCA when coming back from nearby Karatu through Lodura Gate, unless they show a voter identification card. Given that most social services have been suspended inside the area for three years, leaving the NCA is a regular need for youth, men and women seeking education, medical attention, getting supplies, as well as satisfying administrative demands. Government officials also claim that “the NCA environment is unfriendly to foster social services like education because of dangerous wild animals”.¹ Government further suspended the maintenance of roads, which leads to regular problems for the citizens. In Endulen and Oloirobi Villages, the community took to repairing their own roads destroyed by rains.²

There seems to be a tendency in Tanzania to increase presidential powers (initiative for new electoral laws in 2024) and nominate officials with a track record of violence and disregard for the rights of citizens in Maasai inhabited regions. Conservation is increasingly militarized with the use of military and paramilitary personnel in conservation authorities like Tanzania National Parks (TANAPA), the Tanzania Wildlife Management Authority (TAWA) and the Ngorongoro Conservation Area Authority (NCAA), which are also termed the ‘green military’. Teargas, arrests, and torture are used repeatedly, houses are burnt down, and people abducted.³

Besides the park authorities, the Tanzanian Government co-opts police, prison service, and intelligence service and migration authorities into conservation-related measures in the Serengeti Ecosystem, including the NCA. Military bases and personnel are increased. The recently appointed District Commissioner of Ngorongoro is a former military meanwhile the new Regional Commissioner, Arusha, is a man known for his disregard of human rights and use of violence against citizens. He is banned from entering the US due to human rights abuses. The new chair of TANAPA is a retired General and Chief of Defense Forces.

Tanzanian authorities have established a military base 4 km from Wasso, the capital of Loliondo District. The forced Maasai relocations from Ngorongoro to Msomera, including the construction of houses, is carried out by the military. Four military bases were built in the same area. Prison services and police contribute to arbitrary arrests of resisting Maasai. A new actor, called the “Special Operation Task Force/Group, ‘reports to the Tanzanian President and comprises the organisations mentioned above. Because of this and the unclear and mixed composition of the units, it is impossible to take any group to court when it violates the rights of Tanzanian citizens’.⁴

Western agencies and donors are reacting increasingly to the challenges and have stopped / revisited funding of tourism or

conservation projects. This includes the World Bank, USAID (Wildlife Management Areas WMA around Serengeti and NCA), the EU, and the German Government (District Land-Use Framework Plan (DLUFP)).

Update since March 2023

August 2023: In August 2023, the Maasai International Solidarity Alliance (MISA), issued its first (of currently five), well-researched newsletters reporting on the ongoing violations of Maasai rights in Tanzania. MISA was formed in early 2023 as an international alliance including faith-based, human rights, development, and academic organization, showing solidarity with the Maasai in the Ngorongoro Conservation Area and in Loliondo in northern Tanzania. It also conducts activities informing, connecting and holding officials across the world accountable for supporting, directly and indirectly, the illegal actions in Tanzania.⁵

On 22 August, random arrests and abductions of civilians in Endulen, including torture and provocations by fake journalists, are reported by District Councilors of Ngorongoro. These go unpunished and are used to create an atmosphere of fear and uncertainty.

December 2023: The European Parliament voted by 493 votes in favour, with only 29 against, urging the Tanzanian Government to immediately halt the forced evictions of Maasai communities in the country's Ngorongoro District. Parliament also called on the Tanzanian Government to recognize and protect the rights of the indigenous peoples and local communities, and to acknowledge the lands and resources that the Maasai community use for their livelihood.

January 2024: The appointment of a new TANAPA Conservation Commissioner is correlated by the President with the target of 3 Mio tourist arrivals in 2024. The Minister for National Resources and Tourism was quoted saying, "I don't want to hear excuses. I don't expect to hear mining activities or livestock keeping in the Ngorongoro area and the money required to conduct those patrols should be released according to the procedures".⁶

On 14 January Tanzania National Parks Authority paramilitary rangers opened fire and shot several Maasai herders in Kimotorok village in Simanjiro District, outside of Tarangire National Park, at Mkungunero Game Reserve that is recently under huge conflict with the Maasai in Simanjiro District. Eight people were arrested, and over 800 livestock were seized. This is indicative of many events in the past 2-3 years, where cattle were seized. However, on 13 Feb 2024, the Magistrate court in Musoma issued a judgment (misc Criminal Appeal no 10 of 2023) that livestock owners in Loliondo be reimbursed for illegally seized livestock, which was sold off by government staff as "unclaimed property".⁷

23 January: The German Federal Government confirmed that it "stopped funding the development of a draft District Land-Use Framework Plan (DLUFP). This decision was made following the rejection of the draft framework by a majority of the Ngorongoro District Council members on 19 May 2023 and also criticism of the plan from human rights organizations and Maasai representatives".⁸

On 28 January, NCAA received an investment of Tsh 25 billion from China to develop the Ngorongoro-Lengai Geopark Project, a tourism project which will include a large and modern geological museum in the Empakaai crater (!!) inside the World Heritage Site of Ngorongoro. It is expected to be completed by June 2025.⁹

February 2024: The opposition party Chama Cha Demokrasia na Maendeleo (CHADEMA) has peacefully taken to the streets in various cities, highlighting among other things the rights of Maasai and the role of international agencies in being complicit in the repression of Maasai in Tanzania.¹⁰ Just briefly before, plans by the Tanzanian Government to further alienate Maasai land leaked to the public from an undisclosed source. The Government intends to take more than 70% of all Maasai districts comprising Ngorongoro, Longido, Monduli, Simanjiro and Kiteto District. In fact, it will privatize land by creating 16 hunting blocks in the form of Game Reserve and Game Controlled Areas. It is anticipated that this plan will impact over 390,000 Maasai people across over 90 villages, amounting to 15,856 sq. km¹¹ including the World Heritage Site. Interestingly, the land in question is the very area which under colonial rule was delineated as Maasai District in 1934 (see Fig. 2 and 3).

A UNESCO Advisory Mission to the NCA WHS was conducted from 3-9 February 2024 without consultation and participation of the Maasai community. The joint IUCN/ICOMOS/UNESCO Mission (including Nigel Crawhall, UNESCO Chief of Section, Local and Indigenous Knowledge Systems, and Joseph Itongwa, Coordinator of the regional indigenous network REPALEAC) did not meet independent community members or leaders but was fully controlled by the Government of Tanzania. Both the Maasai and groups concerned with the human rights situation such as MISA, requested for a new, independent mission respecting the Maasai populations human and peoples' rights.¹²

The World Bank (WB) has stopped the disbursement of a US\$150 million fund for a Land Tenure Improvement Project (LTIP) through the Government of Tanzania since 2021.¹³ It has suspended its financing "after allegations of killings, rape and forced evictions".¹⁴ Although this refers to Ruaha National Park, it is connected to general issues in tourism development of protected areas, and relevant to the NCA.

On 8 February "the Tanzania Parliamentary Committee on Land, Natural Resources and Tourism submitted a proposal for the whole Parliament's consideration that includes a more system-

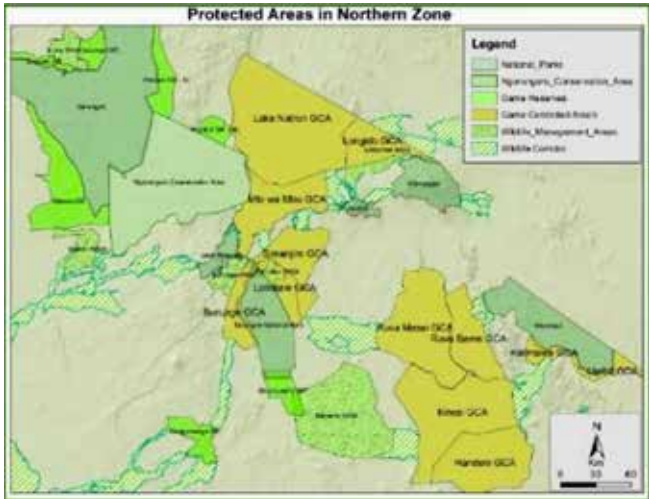


Fig. 2: Map of Protected Areas in the North of Tanzania.
 Source: <https://afsafrica.org/wp-content/uploads/2024/04/misa-news-march-april-2024-final.pdf>



Fig. 4: Maasai protest against the UNESCO/IUCN Advisory Mission.
 Photo source: <https://afsafrica.org/maasai-international-solidarity-alliance-misa-newsletter-april-2024/>

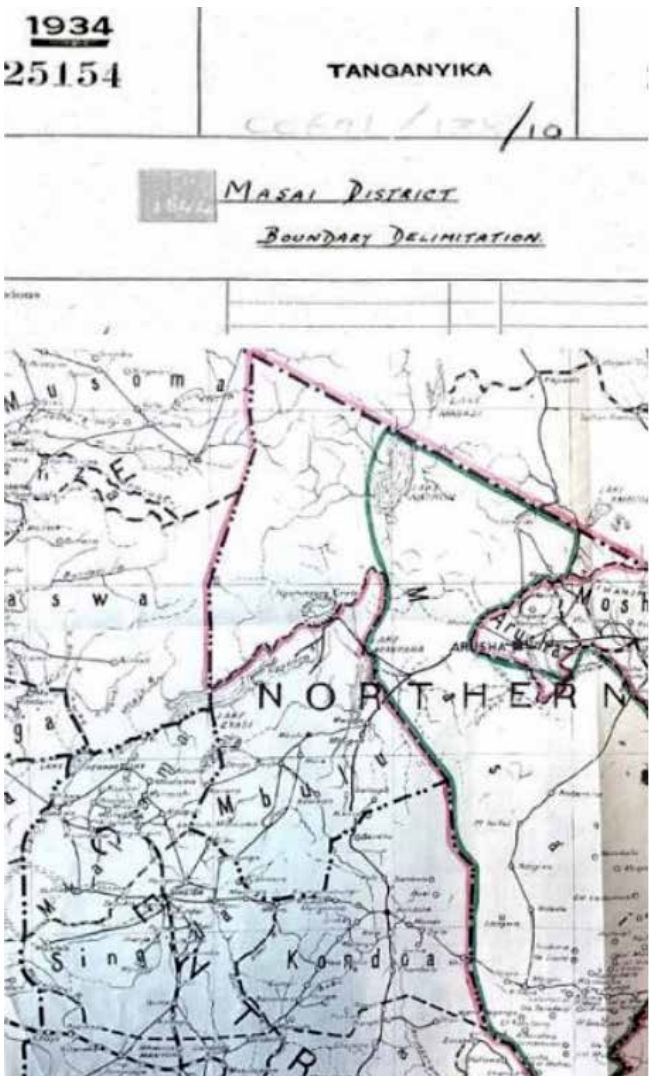


Fig. 3: Map of the Masai District as of 1934.
 Source: <https://afsafrica.org/wp-content/uploads/2024/04/misa-news-march-april-2024-final.pdf>

atic inclusion of the actual military in the relocation of Maasai from Ngorongoro”¹⁵ One military source informed the International Solidarity Alliance (MISA) that nearly all heads of units in

the Tanzania military have had some role in the ongoing Maasai relocation from Ngorongoro.

March 2024: In a press conference on 26 March, the Ngorongoro Pastoral Council highlights the misuse of public funds amounting to 1.6 billion Tanzanian Shillings by NCAA officials in an press conference.¹⁶ In mid-March, Joseph Oleshangai, human rights lawyer from the Legal and Human Rights Centre (LHRC), on the radar of the Government of Tanzania for supporting the Maasai in their struggle against relocation, is threatened, and Tanzanian police conducts eight raids into his house.

In a workshop on 19 March organized as part of the regular Development Committee meetings (DEVE), the European Parliament focused on the impacts of the green transition on African pastoralists. A comprehensive study was presented by Jonathan Davies, expert in sustainable land management, pastoralism, rangelands, and sustainable agriculture. His conclusions and recommendations led to a lively debate with members of the committee. Green Member of European Parliament (MEP) François Thiollet made a powerful intervention calling on the EU to stop funding organisations that criminalise and expel indigenous peoples, as in Tanzania with the Maasai. Thiollet called on Tanzania to protect and stop attacking human rights defenders like Joseph Oleshangai.¹⁷

On 29 March, Christopher Olesendeka, a Maasai Member of Parliament for Simanjiro, critical of the growing state-led hostility against Maasai, survived an assassination attempt. His car was under gunfire at close range by unidentified gunmen, but he survived unharmed.

In April 2024, 135 families relocated to Msomera Village in Handeni District (Tanga region) from the NCA accuse the government not to honor its promises, including a piece of land for cattle grazing, settlement, and farming, which were not fulfilled.¹⁸

In May 2024, the UK Parliament House of Commons condemns the forced evictions.¹⁹

On 9 May 2024, at Bandung Conference in Nairobi, an International Coalition of Lawyers, Academics and Parliamentarians calls upon President Samiah Hassan to cease the ethnic cleansing of the Maasai communities in Tanzania. In a press statement, apart from mentioning the Maasai people as communities that form a significant part of the international heritage and reputation of Tanzania, and whose uniqueness attracts a great number of tourists, the conference also mentions “that the systematic and oppressive ethnic cleansing of the Maasai people should not be her (the president’s) legacy”.²⁰

Notes

- 1 Richard Kiiza, NCAA Commissioner, in a document by the Ministry for Natural Resources and Tourism (MNRT) in January 2024
- 2 International Solidarity Alliance (MISA) Newsletter January/February 2024
- 3 *ibid*
- 4 International Solidarity Alliance (MISA) Newsletter January/February 2024
- 5 <https://www.fian.de/was-wir-machen/fallarbeit/tansania-maasai/misa-newsletter/>
- 6 <https://dailynews.co.tz/new-tanapa-boss-given-tourists-arrival-target-for-2024/>
- 7 International Solidarity Alliance (MISA) Newsletter January/February 2024
- 8 International Solidarity Alliance (MISA) Newsletter January/February 2024
- 9 <https://www.thecitizen.co.tz/tanzania/news/national/tanzania-china-sign-deal-for-ngorongoro-lengai-geopark-project--4506212>
- 10 International Solidarity Alliance (MISA) Newsletter March/April 2024
- 11 *ibid*
- 12 *ibid*
- 13 <https://www.worldbank.org/en/news/press-release/2021/12/21/tanzania-new-world-bank-financing-to-secure-land-rights-for-up-to-two-million-citizens>
- 14 <https://www.theguardian.com/global-development/2024/apr/23/world-bank-suspends-tanzania-tourism-funding-after-claims-of-killings-and-evictions>
- 15 International Solidarity Alliance (MISA) Newsletter January/February 2024
- 16 <https://www.youtube.com/watch?v=QzcVavHlkC8>
- 17 International Solidarity Alliance (MISA) Newsletter March/April 2024
- 18 <https://www.youtube.com/watch?v=jKbV6cNEduI>
- 19 <https://edm.parliament.uk/early-day-motion/62235/maasai-evictions-in-tanzania>
- 20 International Coalition of Jurists, Academics and Parliamentarians Calls Upon President Suluu Hassan to Cease the Ethnic Cleansing Of Maasai Communities: Embargo: Monday, 9th May 2024

ReconAfrica and Namibia are ignoring all international decisions: Drilling to continue in June 2024

Andy Gheorghiu, Saving Okavango's Unique Life (SOUL) Alliance



In the World Heritage Watch Reports 2021¹, 2022², and 2023 the Saving Okavango's Unique Life (SOUL) Alliance outlined the threats posed by the oil and gas plans of Canadian company ReconAfrica for the World Heritage Site Okavango Delta.

UNESCO's World Heritage Committee, provided with evidence regarding the activities of the company and the inaction of the relevant State Parties, expressed on its 45th Session in September 2023 (inter alia):

- *its utmost concern about the advancement of the oil and gas exploration activities, located outside the buffer zone, in the environmentally sensitive upstream areas of the Okavango Delta in northwestern Botswana and northeastern Namibia, that may pose significant risks to the interconnected water system and the ecosystem,*
- *its request to the States Parties of Botswana, Angola and Namibia to ensure that petroleum exploration and other large-scale development projects with potential adverse impact (...) are subject to rigorous and critical prior review, including through Environmental Impact Assessments that correspond to international standards,*
- *its position that mineral exploration or exploitation is incompatible with World Heritage status.*

It seems, however, that the Namibian government is willing to ignore UNESCO's repeated demands completely. In October 2023, the Namibian Ministry of Mines and Energy granted ReconAfrica a second renewal to explore the Kavango basin, and in December 2023 the company announced that it will continue "to advance activities in preparation for the drilling program planned for 2024 with land access work, community engagement, demining activities, and key equipment and services procurement in progress."

ReconAfrica – who is currently also under investigation by the Canadian Ombudsperson for Responsible Enterprise over alleged human rights abuses³ – obviously supported by the Namibian government, continues to ignore UNESCO's demands and has announced new drilling operations in June of 2024.⁴

Study outlines potential groundwater contamination from oil drilling in the Okavango

A study published in October 2023⁵ investigated the oil and gas plans of ReconAfrica in Namibia and Botswana, and calculated and mapped potential groundwater contamination effects from oil and gas drillings in the targeted region.

The key findings are as follows:

- Oil drilling contaminants could pollute the groundwater in the drilling area.
- Current drilling site contamination could reach the Okavango River within 10 years.
- Groundwater contamination could have lasting effects on ecosystems and communities.

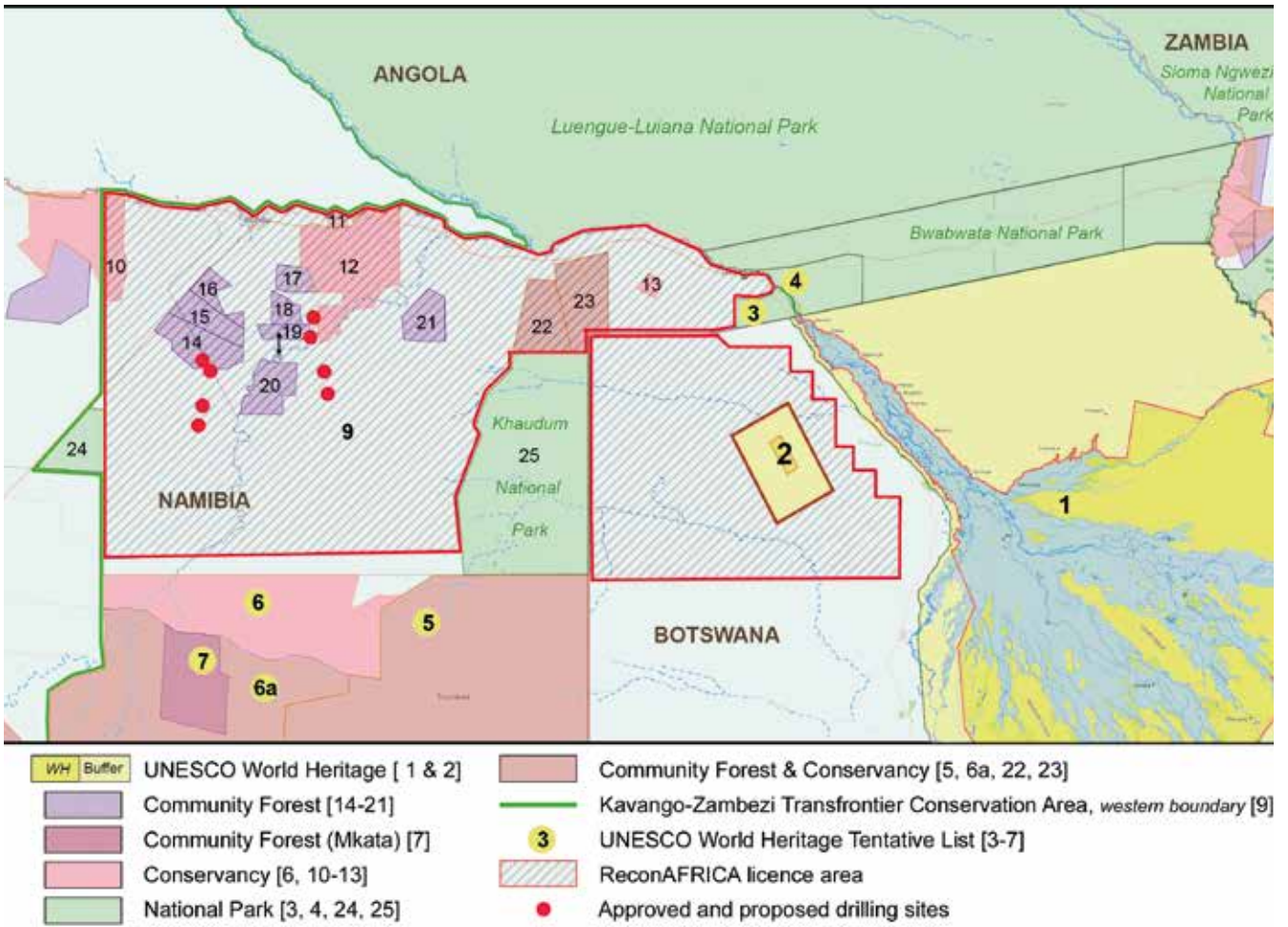
The danger to the Okavango World Heritage Property through Recon Africa's upstream activities is therefore very realistic and must be addressed accordingly.

Immediate tangible action needed

The World Heritage Committee must now step in again and take a decision urging all State Parties that all World Heritage sites and those on its Tentative List be excluded from any prospecting and exploration of fossil fuels. Enough warnings have been sent out. Something tangible needs to happen!

Notes

- 1 <https://world-heritage-watch.org/content/wp-content/uploads/2021/06/WHW-Report-2021.pdf>
- 2 <https://world-heritage-watch.org/content/wp-content/uploads/2022/11/2022-Report-WHW-final.pdf>
- 3 <https://www.nationalobserver.com/2024/04/10/news/alleged-human-rights-abuses-detailed-complaint-against-canadian-oil>
- 4 https://www.rigzone.com/news/reconafrika_to_drill_namibia_asset_in_june-19-apr-2024-176475-article/
- 5 <https://www.sciencedirect.com/science/article/pii/S1474706523000748>



# (map)	Name	Country	UNESCO name	UNESCO status	Affected zones
1	Okavango Delta	Botswana	Okavango Delta	inscribed	wider setting
2	Tsodilo	Botswana	Tsodilo	Inscribed	wider setting
3	Bwabwata NP (Mahango core area)	Namibia	Okavango Delta	Tentative List	buffer zone (likely)
4	Bwabwata NP (Buffalo core area)	Namibia	Okavango Delta	Tentative List	buffer zone (potentially)
5	Nyae Nyae Conservancy	Namibia	Sān Living Cultural Landscape	Tentative List	buffer zone (potentially) or wider setting
6	N#a-Jaqna Conservancy	Namibia	Sān Living Cultural Landscape	Tentative List	
6a	N#a-Jaqna Conservancy	Namibia	Sān Living Cultural Landscape	Tentative List	
7	Mkata Community Forests	Namibia	Sān Living Cultural Landscape	Tentative List	

Fig. 1: World Heritage – related areas in the vicinity of the ReconAfrica concession.

Map: Martin Lenk / WHW

V. Natural Properties

More Action Needed for the Islands and Protected Areas of the Gulf of California

Alejandro Olivera on behalf of the
Center for Biological Diversity
Animal Welfare Institute
Natural Resources Defense Council and
Environmental Investigation Agency



The Center for Biological Diversity, the Animal Welfare Institute, the Natural Resources Defense Council and the Environmental Investigation Agency have repeatedly urged the World Heritage Centre (“Centre”) and the International Union for Conservation of Nature (“IUCN”) to ensure that strict corrective measures and strong criteria for the Site’s Desired State of Conservation for Removal (“DSOCR”) from the “in danger” list are approved. The corrective measures approved at the 45th session were not sufficient to protect the vaquita and totoaba, both species of Outstanding Universal Value (OUV).



Fig. 1: The vaquita, the world’s most endangered marine mammal, is on the brink of extinction with only 10 individuals remaining.

Photo: Paula Olson / U.S. National Oceanic and Atmospheric Agency

Multiple international bodies including the World Heritage Centre, the Convention on International Trade in Endangered Species of Wild Fauna and Flora (“CITES”),¹ the International Whaling Commission,² the IUCN – SSC Cetacean Specialist Group³ and the International Committee for the Recovery of the Vaquita⁴ have repeatedly advised Mexico on what must be done – in some cases for decades – to protect and recover the vaquita: gillnets must be removed from the vaquita’s habitat.

At its 44th session, the World Heritage Committee (“WHC”) found that if Mexico’s September 2020 regulations⁵ (“the Agreement”) were enforced, the regulations “could have the potential to reduce totoaba poaching and vaquita bycatch.”⁶ However, the WHC acknowledged that Mexico “ha[d] not fully implemented the regulations and has failed to enforce them” and that “illegal fishing of totoaba has continued.”⁷

On its 45th session, the WHC reiterated its utmost concern about “the critical status of the vaquita, specifically recognized as part of the property’s Outstanding Universal Value (OUV) and endemic to the Gulf of California, and that illegal fishing of totoaba has continued in the Upper Gulf of California resulting in a threat of imminent extinction of the vaquita species.”⁸ The Committee urged Mexico to implement a series of corrective measures. These included increasing law enforcement and surveillance to crack down on illegal wildlife trafficking, toughening penalties for illegal activities and removing abandoned fishing gear from the vaquita’s habitat. The WHC also recommended Mexico to fully implement the permanent ban on gillnets in the vaquita’s range, cooperate with other countries to



Fig. 2 and 3: Boats equipped with unauthorized fishing gear (gillnets) are seen off the coast of the popular tourist destination, San Felipe, in Baja California, Mexico. These boats often set up their fishing gear within the habitat of the vaquita, a marine species found near San Felipe. Photo: Alejandro Olivera / Center for Biological Diversity

combat the illegal trade in totoaba swim bladders and provide incentives for fishermen to use alternative fishing gear that does not entangle vaquitas.⁹ However, the WHC did not adopt a DSOCR for the Site deferring its approval to the 46th meeting to permit Mexico to engage in additional consultations.

Despite the WHC's directives, implementation of the Agreement remains incomplete, and Mexico continues to fail to halt illegal fishing and vessel operation in the Zero Tolerance Area ("ZTA") and to prevent illegal fishing in the broader vaquita refuge. As recently as December 12, 2023, the Sea Shepherd Conservation Society ("SSCS") documented 4 vessels in the ZTA and⁹ vessels in the ZTA expansion area engaged in illegal gillnet fishing.¹⁰ SSCS reported that same day that: "After a weekend of bad weather in the area, today the conditions were optimal for fishing. We could see this with the huge number of fishing boats surrounding the borders of the ZTA.... At 8:00, three small boats were seen fishing inside the south of ZTA. The navy was contacted, sent the interceptor and they pulled up the nets that were inside of the ZTA...The peak of the fishing activity was around 12:00 when we spotted 65 small boats at the east side of Vaquita Refuge and 50 in the south of ZTA expansion."¹¹ Since then, there have been several days where dozens of vessels have been observed fishing or potentially fishing with nets in the ZTA expansion while clam divers have also been documented illegally entering the ZTA.¹²

Vaquitas are not the only mammals threatened by fishing gears. As recently as January 9th, SSCS documented "A big number of whales, mostly humpback whales, were seen today navigating inside the ZTA and ZTA expansion, 2 pairs of mothers with calves were seen jumping so the drone operator confirmed no nets were attached to the body of the animals."¹³

These blatant, regular violations may be occurring due to a lack of meaningful enforcement action taken by the Mexican Navy when confronting illegal fishers. The Navy may occasionally seize an illegally set net,¹⁴ but it generally only requests that illegal fishers pull their nets and leave the area without issuing any citations or making any arrests.¹⁵

Continued, blatant illegal fishing within the vaquita habitat further amplifies the urgent need for Mexico to fully implement the Agreement, which requires more than maintaining the net-free zone. These additional provisions include equipping all vessels (large and small) with vessel monitoring systems, prohibiting night-time fishing, inspecting all vessels at specified embarkation/disembarkation points, and prohibiting the possession, sale, transport and manufacturing of gillnets.¹⁶

CITES

In November 2022, based on the Secretariat recommendation's in SC 75 Doc. 7.5, the CITES Standing Committee requested that Mexico "urgently address inconsistencies in the implemen-

tation of the different aspects of the Agreement" and prepare a Compliance Action Plan (CAP). Specifically, Mexico was directed to submit a "finalized" CAP to the Secretariat by 28 February 2023 including:

1. a clear outline of the actions to be taken to "urgently progress implementation ... to effectively prevent illegal fishers and unauthorized vessels from entering the vaquita refuge and zero-tolerance areas and maintain them as gillnet net-free zones;"
2. a timeframe by which each action will be "fully achieved;" and
3. "milestones to enable assessment of satisfactory implementation."¹⁷

In November 2023, at the 77th Standing Committee meeting, the CITES Secretariat presented SC77 Doc. 33.13.2 on totoaba including its observations on Mexico's implementation of its CAP for the period from 18 April to 31 July 2023. After considerable debate, the Committee requested that the Secretariat undertake a third technical mission to Mexico to monitor implementation of the CAP. It also agreed to review Mexico's progress with the implementation of its CAP at its 78th meeting in early 2025 and consider if any further compliance actions or measures are needed.¹⁸

Notably, two of the world's foremost vaquita experts, Drs. Barb Taylor and Lorenzo Rojas Bracho, also assessed Mexico's compliance with the CAP and found it grossly lacking. A detailed critique of each of the significant failings included extensive and continued use of gillnets in the ZTA, no significant progress towards the use of alternative fishing gears, and impeded vaquita monitoring due to the illegal fishing activity.¹⁹ The IUCN Cetacean Specialist Group (CSG) submitted a letter to the CITES Secretariat in support of this expert analysis, and expressed its concern with Mexico's failure to fully comply with the CAP.²⁰ The CSG noted that "There is, for example, no evidence that illegal gillnet use within the Vaquita Refuge has been (or will be) reduced, which means there is no potential for vaquitas to recover. Moreover, the continued tolerance of illegal activities outside the ZTA means that totoaba will continue to be poached with impunity in areas where they are known to occur in relatively high densities."



Fig. 4: Fishermen are seen retrieving unauthorized fishing gear (gillnets) within the habitat of the vaquita.

Photo: Alejandro Olivera / Center for Biological Diversity

Moreover, the CAP should be amended and strengthened. Its actions, targets and milestones fall short of what is urgently needed to meaningfully address illegal fishing, create a culture of enforcement and fully implement the Agreement. The CAP does not include measurable actions or targets that reflect all the articles in the Agreement despite CITES Parties, at CoP19, approving Decision 18.293 (Rev. CoP19) directing Mexico to pursue the urgent implementation of all aspects of the Agreement. The Agreement, if fully implemented and enforced, would provide a substantive foundation for the recovery of the vaquita population; full implementation of the CAP would not ensure vaquita recovery.

Actions Needed

Strong corrective measures and robust criteria to achieve a DSOCR for the Site to warrant its removal as “in danger” are critically important to compel Mexico to act, including by fully enforcing its own laws. Furthermore, stopping illegal fishing and achieving a gillnet free Upper Gulf of California would broadly benefit the biological and ecological integrity of the Site. Despite evidence of some progress in combatting illegal fishing in the ZTA and Vaquita Refuge, the sole threat to the vaquita – entanglement in illegal gillnets set to catch totoaba and other species in the Upper Gulf – remains.

At its 46th meeting, we urge the WHC to amend and approve strengthened corrective measures for the Site and to approve strong DSOCR criteria. Proposed corrective measures were shared and discussed during the DSOCR Technical Workshop in 2022, and our organizations submitted amendments to strengthen those measures and criteria. Specifically, we strongly encourage the WHC to direct Mexico to:

- Prevent fishers and unauthorized vessels from entering the ZTA and Vaquita Refuge, as already required by law.
- Eliminate illegal and derelict fishing gear in the vaquita habitat, including the Vaquita Refuge and the ZTA, in coordination with relevant stakeholders and fishing communities.
- Strengthen law enforcement effectiveness through vastly increased surveillance and inspection both within and outside the ZTA.
- Secure the necessary legislative changes to increase the penalties for illegal traffic, capture, possession, import and export of wildlife and strengthen criminal prosecution procedures.
- Fully implement and fund all aspects of the Agreement.
- Ensure the large-scale availability and use of existing alternative fishing gear systems which do not cause entanglement of vaquita and other protected species by providing appropriate incentives, permits, training and other measures; continue to develop and test alternative fishing gear systems; and promote sustainable fisheries.

Notes

- 1 In addition to the action taken by the CITES Standing Committee as summarized in this letter, CITES Parties approved a new set of Decisions at the 19th Conference of the Parties in November 2022.
- 2 Draft Resolution on the Critically Endangered Vaquita. Submitted by: Austria, Belgium, Czech Republic, Croatia, Denmark, Estonia, Finland, France, Germany, Hungary, Ireland, Italy, Luxembourg, Netherlands, Poland, Slovak Republic, Slovenia, Spain, Sweden, the United Kingdom, and the USA. IWC/66/20 Rev, Agenda Item 6.7. Available at: [https://archive.iwc.int/pages/view.php?ref=6315&k=&search=vaquita&offset=0&order_by=resource-type&sort=DESC&archive=](https://archive.iwc.int/pages/view.php?ref=6315&k=&search=vaquita&offset=0&order_by=resource-type&sort=DESC&archive=;); see also, International Whaling Commission. 2022, Report of the Scientific Committee (available at: <https://archive.iwc.int/pages/view.php?ref=19447&k=#>)
- 3 IUCN – SSC Cetacean Specialist Group / Critically Endangered
- 4 Report of the Eleventh Meeting of CIRVA. La Jolla, CA, Feb. 19–21, 2019. Available at: <http://www.iucn-csg.org/wp-content/uploads/2019/03/CIRVA-11-Final-Report-6-March.pdf>.
- 5 AGREEMENT regulating gear, systems, methods, techniques and schedules for carrying out fishing activities with small and large vessels in Mexican Marine Zones in the Northern Gulf of California and landing sites are established, as well as the use of monitoring systems for such vessels. Available at: <https://www.dof.gob.mx/notadetalle.php?codigo=5601153&fecha=24/09/2020#gsc.tab=0>
- 6 Decision 44 COM 7A.56.
- 7 Id.
- 8 Decision 45 COM 7A.2
- 9 Id.
- 10 See: <https://seashepherd.org/category/reports/>
- 11 See, <https://seashepherd.org/2023/12/12/scientists-report-12-12-23/>
- 12 See, e.g., <https://seashepherd.org/2024/01/06/scientists-report-01-06-24/>; <https://seashepherd.org/2024/01/07/scientists-report-01-07-24/>
- 13 See: <https://seashepherd.org/2024/01/11/scientists-report-01-09-24/>
- 14 In March 2023 it was reported that in a single tour Mexican federal authorities seized three gillnets of 3,400 meters in length making clear that illegal gillnet fishing remains active in the region (see: <https://www.debate.com.mx/bajacalifornia/Decomisan-redes-prohibidas-y-liberan-5-totoabas-en-Alto-Golfo-de-California-20230325-0302.html>)
- 15 CITES SC75 Doc. 7.5 at para. 26.
- 16 See Agreement at Articles two, four, six, seven, eight, and nine.
- 17 CITES SC75 Doc. 7.5 paragraph 52(iii)(A-C); SC75 Summary Record (13 Nov. 2022), available at: <https://cites.org/sites/default/files/eng/com/sc/75/E-SC75-SR.pdf> (adopting proposed text).
- 18 SC77 Sum.7 (Rev.1). Available at: https://cites.org/sites/default/files/documents/E-SC77-Sum-07-R1_0.pdf
- 19 <https://iucn-csg.org/actions-taken-by-government-of-mexico-are-insufficient-to-save-the-vaquita/>
- 20 https://iucn-csg.org/wp-content/uploads/2023/11/Combined-CSG-letter-and-analysis-re-Vaquita-and-CITES-SC-2023_rev.pdf

The Galapagos Islands Fulfill the Criteria to be Included on the List of World Heritage In Danger

Alejandro Olivera, Center for Biological Diversity



World-renowned for its biodiversity and extraordinary endemism, Ecuador's Galapagos Islands hold incredible natural heritage. Ecuador created the Galapagos National Park¹ to commemorate the first centenary of the publication of the book "The Origin of Species" by Charles Darwin,² who was inspired to develop his famous theory of evolution by natural selection based on the observations made during his stays in these islands. The Galapagos National Park was inscribed in the UNESCO World Heritage List in 1978.³ In 1998, Ecuador expanded the Park to include a broader marine protected area and created the Galapagos Marine Reserve.⁴ In 2001 the Committee

approved the extension of the World Heritage site by the addition of the Galapagos Marine Reserve⁵ due to its unique ecosystems and biodiversity.

The Galapagos Islands World Heritage property ("the Galapagos") is one of the largest marine protected areas in the world, covering 138,000 square kilometers. The property has several, recognized Outstanding Universal Values (OUV). These include marine life diversity (criterion vii), geological interest (criterion viii), evolutionary significance (criterion ix) and species endemism (criterion x).



Fig. 1: Zoning map of the Galapagos Islands.

Map: Dirección del Parque Nacional Galápagos

There have long been significant concerns with the management of the Galapagos property. The property was inscribed on the World Heritage List in Danger in 2007⁶ due to “the variety of threats that the property faces” following a reactive monitoring mission.⁷ In 2010 the property was removed from the World Heritage List in Danger,⁸ but the decision urged Ecuador to continue strengthening its efforts in implementing the corrective measures for the property.⁹

Despite more than 15 years of the World Heritage authorities reviewing the Galapagos Islands threats and governance, conservation issues continue to be a major concern for the property. These issues were once again highlighted during the 2021 World Heritage Committee session, including regarding excess tourism and fishing activities by foreign vessels near the property.

In the 2023 World Heritage Committee session, Ecuador was again urged¹⁰ to address the ongoing concerns about the increase in tourism and commercial flights to the property. It was called to devise and execute a comprehensive tourism strategy and action plan with immediate measures to attain a zero-growth model. This includes upholding the ban on new tourism projects and restricting the number of flights. It was also called to enhance regional cooperation with neighboring countries for a unified approach to curbing illegal, unregulated, and unreported (IUU) fishing practices in the area.

Illegal, unreported, and unregulated (IUU) fishing

Illegal, unreported, and unregulated (IUU) fishing continues and poses a significant threat to the OUV of the Galapagos. There

have been numerous reports of widespread IUU fishing by foreign vessels in the waters surrounding the Galapagos Islands, including particularly Chinese-flagged vessels. In August 2017, the Galapagos National Park Directorate’s Monitoring System detected the Chinese-flagged cargo ship *Fu Yuan Yu Leng 999* crossing through the Galapagos marine protected area. Upon inspection, approximately 300 tons of fish were found on board, including more than 6,623 sharks,¹¹ which comprised 75% of the fish found inside the ship.

In July 2020, the Ecuadorian Navy identified¹² a foreign fishing fleet, numbering about 342 boats, had been stationed just off the EEZ around the Galapagos and that naval personnel were prepared to intercept any ship that enters illegally.¹³ The vast majority of vessels were Chinese-flagged or owned. Made up mostly of jiggers,¹⁴ the fleet evaded the EEZ limit using high lights and industrial vertical fishing machines to catch, through legal mechanisms, massive quantities of fish for 73,000 hours over a month just outside one of the most biodiverse maritime areas in the world.¹⁵ The defense minister later revealed that about half of the Chinese fleet had turned off its tracking and identification systems,¹⁶ a tactic known as “marine radar evasion,” common in illegal fishing.

Recent research¹⁷ confirmed two major issues. First, dozens of Chinese vessels, many with a history of illegal fishing, disappeared from radar for up to 17 days at a time, which is illegal if done intentionally. Second, in the same period, unidentified covert ships were seen within the Ecuadorian EEZ on multiple occasions, including some directly next to the Chinese fleet. While fishing in this manner is not technically illegal, the intensity and scale of the fleet’s fishing activities push the limits of

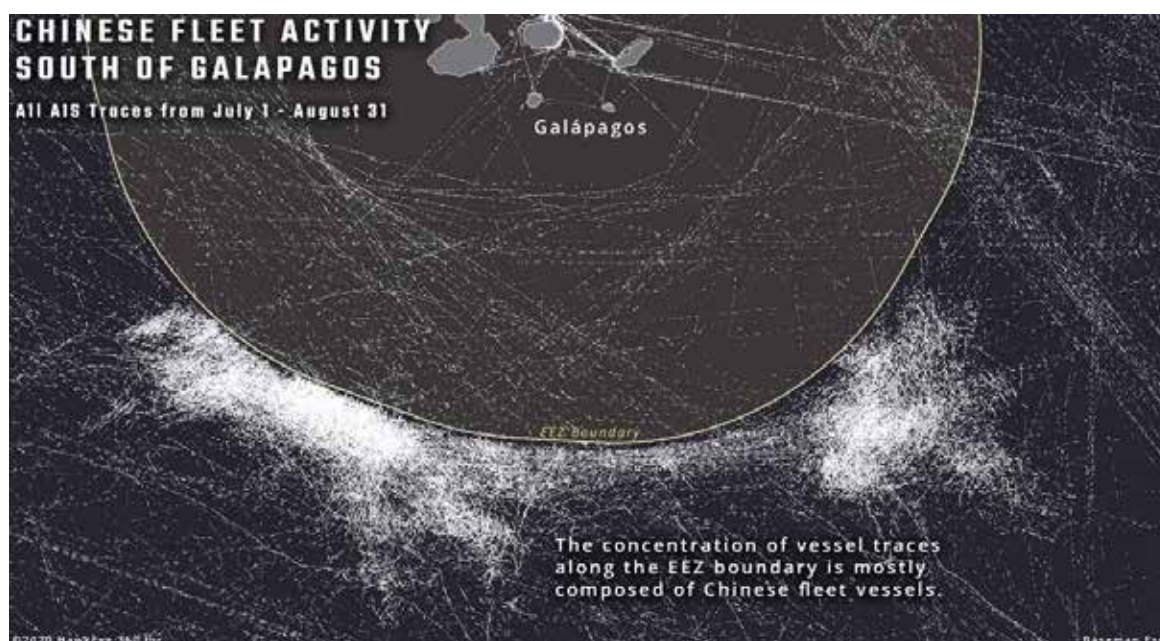


Fig. 2: Chinese fleet activity South Galapagos from July to August 2020. Composed of data, illustrates all Automatic Identification System (AIS) vessel traces, highlighting the intensity of Radio Frequency (RF) activity as the fleet congregated along the southern edge of the Exclusive Economic Zone (EEZ) boundary.

Image: HawkEye 360 Inc.

acceptable conduct, depleting adjacent waters of various marine species jeopardizing the property's biodiversity (Fig. 2).

A tool was designed to identify gaps in AIS records where vessels appear to vanish for eight or more hours. The subsequent graphic illustrates all such disappearances, categorized into half-month periods throughout July and August 2020 (Fig. 3).

More recent evidence proves that IUU fishing remains a problem to the Galapagos Islands property. In a 2022 report, Global Fishing Watch found¹⁸ that 615 industrial-scale vessels were fishing in the high seas west of South America, spending a total of 876,366 operating hours, equivalent to 94,559 days. Of these ships, 95 percent were from China, and the rest flew flags from Chinese Taipei or the Republic of Korea. Tracking data showed that hundreds of these Chinese boats were fishing up to the edge of the Galapagos Marine Reserve. And 34% of the vessels identified on AIS had data gaps longer than 24 hours and devices can be misused, and approximately 10% of the fleet exhibited AIS irregularities that lead to confusion in terms of identity or location.¹⁹

Moreover, massive catching of squid outside Ecuador's EEZ can affect the property's biodiversity. Squids are at the core of the ocean food web and are main food for different finfish species, marine mammals, and birds. These migratory creatures travel thousands of kilometers between coastal areas and the high seas for feeding and spawning. Their movement often spans multiple regions, including the EEZs of coastal states and the high seas. Unregulated spaces, such as EEZs, are typically adjacent to regulated ones, and squid populations move freely across these boundaries. This leads to competition between coastal fishermen in small-scale vessels and larger vessels from

long-distance fleets. This situation creates an equity imbalance for traditional and small-scale fishers who rely on squid. It also affects developing coastal states that depend on the income from these species as the populations move between regulated and unregulated areas.

Biosecurity

Invasive species are a major global threat to biodiversity, and the Galapagos Islands are not exempt from this challenge.²⁰ These species significantly endanger the Islands' endemism, a key aspect of their OUV. At least 1,579 alien species have been recorded, both terrestrial and marine, to the Galapagos, with 1,476 of these successfully establishing themselves. The Galapagos Islands have also been infected by the avian flu strain. The first confirmed cases of avian flu in Galapagos birds were recorded on September 19, 2023.²¹ The park reported that three seabirds died from bird flu H5N1.²² There is a concern that the virus may spread from species that are highly susceptible, such as gulls, to those that have been less affected so far. The 18 species of Galapagos finches, made famous by Charles Darwin, coexist closely with large seabird colonies. While disease is not a typical cause of extinction, contagious pathogens can drive small populations towards a critical point of no return.²³

Tourism

Tourism and biosecurity risks are very related. International tourism, a component of global human movement, is acknowledged as a conduit for the swift transport of invasive alien species. The global spread of exotic species, largely facilitated by human activities, is a significant factor in biological invasions and the subsequent loss of biodiversity.

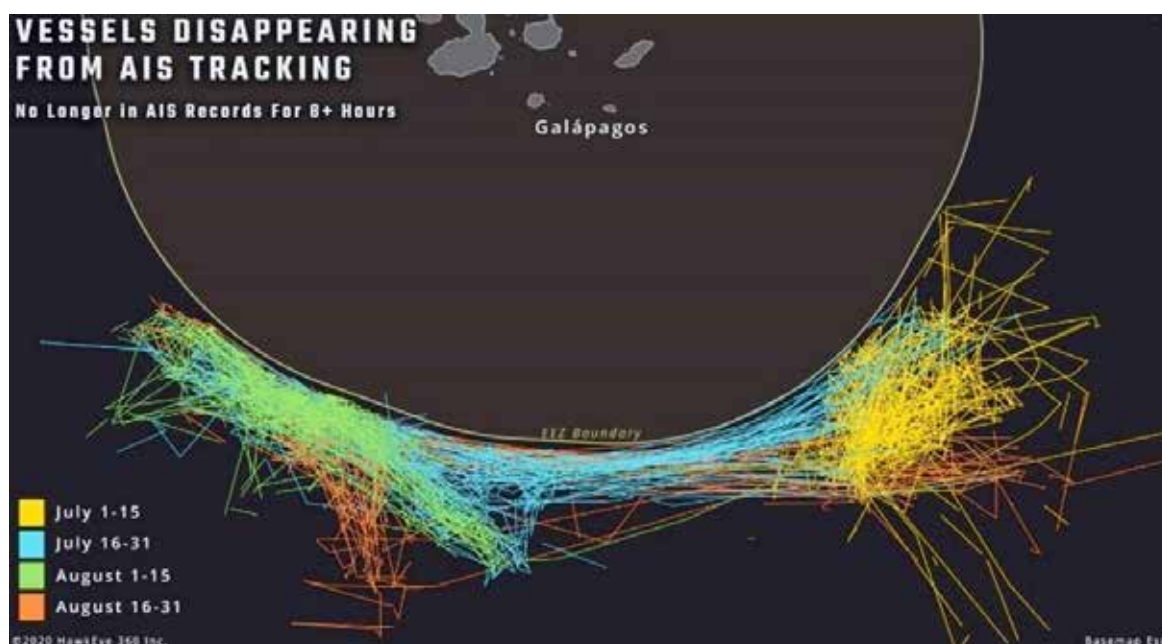


Fig. 3: Vessels disappearing from AIS tracking for more than 8 hours from July to August 2020. As the Chinese fleet made its way into the region, there was a significant increase in the number of dark tracks, with vessels flying the Chinese flag accounting for 87% of all gaps by the end of July. Similarly, when broken down by vessel type, fishing vessels made up 90% of all gaps.

Image: HawkEye 360 Inc.

The pandemic caused a decrease in arrivals to the Galapagos, however, a resurgence in visits began in 2021, with a recorded 136,330 tourist arrivals. In 2022, the number of arrivals continued to recover to pre-pandemic levels, reaching 267,686 tourists. The Ministry of Tourism's goal is to reach 2 million visitors by 2025 in all Ecuador.²⁴

Pollution

Plastic pollution is a global problem that threatens the Galápagos archipelago and is a growing issue that requires further action to mitigate its current and future impact. Marine plastics are emerging as a deleterious and widespread threat to endemic species.²⁵ The Darwin Foundation conducted an analysis of 1,442 plastic samples collected from various locations across the Galapagos Islands.

Conclusion

The World Heritage Committee has long been aware of many of these issues. In 2023, the Committee urged Ecuador to address these concerns by implementing a comprehensive tourism strategy, restricting flights, and enhancing cooperation to curb illegal fishing. The Property is facing many threats and warrants listing as "World Heritage in Danger" under the World Heritage Convention to highlight growing concerns at the Property and prioritize the Property's monitoring. The Committee must request that China work with Ecuador to address its burgeoning illegal fishing problem.

Notes

- Under executive decree N-17, Published in the Official Gazette No. 873 of July 20, 1959.
- Desmond, Adrian; Moore, James (1991), Darwin, London: Michael Joseph, Penguin Group, ISBN 0-7181-3430-3
- Intergovernmental committee for the protection of the world cultural and natural heritage. Second Session. Washington, D.C. (USA) 5 to 8 September 1978. Final Report
- Organic Law of the Special Regime for the Conservation and Sustainable Development of Galapagos. More on: <https://galapagos.gob.ec/reserva-marina/>
- Decision 25 COM X.B Galápagos Islands. Extension to include the Galápagos Marine Reserve.
- Decision 31 COM 8C.1. Inscriptions on the World Heritage List in Danger
- Decision 30 COM 7B.29. State of Conservation (Galápagos Islands)
- Decision 34 COM 8C.3. Establishment of the World Heritage List in Danger (Removed Properties)
- Decision 34 COM 7A.15. Galapagos Islands (Ecuador) (N 1 bis)
- Decision 45 COM 7B.67
- Jueces ratifican el pago de \$ 6.1 millones por daños ambientales en Galápagos en caso de barco chino Fu Yuan Yu Leng 999. Ministerio del Ambiente. Boletín N° 223. Pichincha, 21 de mayo del 2019.
- Available at: <http://www.armada.mil.ec/?p=48604>
- evolution of the fleet: a closer look at the Chinese fishing vessels off the Galapagos. October 19, 2020. Available at: <https://cimsec.org/evolution-of-the-fleet-a-closer-look-at-the-chinese-fishing-vessels-off-the-galapagos/>
- 'It's terrifying': can anyone stop China's vast armada of fishing boats? The Guardian. 25 Aug 2020. <https://www.theguardian.com/environment/2020/aug/25/can-anyone-stop-china-vast-armada-of-fishing-boats-galapagos-ecuador>
- Pesca ilegal china en las Galápagos: una amenaza para la biodiversidad del Pacífico Latinoamericano. Open Democracy. November 19, 2020. Available at: <https://www.opendemocracy.net/es/pesca-ilegal-china-galapagos-biodiversidad-pac%C3%ADfico-latinoamericano/>
- Ministro Oswaldo Jarrín dice que más de la mitad de la flota china que está cerca de Galápagos desactivó su ubicación. El Universo. August 18, 2020. Available at: <https://www.eluniverso.com/noticias/2020/08/18/nota/7946833/ministro-oswaldo-jarrin-dice-que-mas-mitad-flota-china-cerca/>
- Available at: <https://www.he360.com/resource/potential-illegal-fishing-seen-from-space/>
- Análisis de la flota pesquera de larga distancia de calamar del Pacífico Sur-oriental GFW-2022-FA-SQUID202. February, 2022.
- Id.
- Ruiz-Ballesteros, E., & del Campo Tejedor, A. (2022). Eradicate to construct nature. Goats, rats, and humans in Floreana (Galapagos Islands). *Ethnos*, 1-20.
- Gripe aviar: el virus H5N1 llegó al Parque Nacional Galápagos. Mongabay. October 16, 2023. Available at: <https://es.mongabay.com/2023/10/gripe-aviar-virus-h5n1-parque-nacional-galapagos/#:~:text=Gripe%20aviar:%20el%20virus%20H5N1%20illeg%C3%B3%20al%20Parque%20Nacional%20Gal%C3%A1pagos&text=La%20gripe%20aviar%2C%20que%20desde%20noviembre%20de,golpea%20a%20las%20especies%20marinas%20de%20las>
- Gobierno Nacional implementa acciones ante presencia de aves muertas en Galápagos. Press release. Available at: <https://galapagos.gob.ec/gobierno-nacional-implementa-acciones-ante-presencia-de-aves-muertas-en-galapagos/>
- Stokstad, E. (2023). Deadly avian flu hits Galápagos. *Science* (New York, NY), 381(6665), 1382-1382.
- In Ecuador, plans for a tourism boom. February 15, 2022. Available at: <https://www.ifc.org/en/stories/2022/plans-for-a-tourism-boom-in-ecuador>
- Alava, J. J., McMullen, K., Jones, J., Barragán-Paladines, M. J., Hobbs, C., Tirapé, A., ... & Schofield, J. (2023). Multiple anthropogenic stressors in the Galápagos Islands' complex social-ecological system: Interactions of marine pollution, fishing pressure, and climate change with management recommendations. *Integrated Environmental Assessment and Management*, 19(4), 870-895.

Tourism Pressures Undermine Protection of the Mosi-oa-Tunya / Victoria Falls

Anonymous author

The latest State of Conservation Report fails to update UNESCO on recent and proposed tourism developments within the World Heritage Site. Urgent action is needed from the World Heritage Committee to uphold the integrity of the site.

The 2024 State of Conservation report for the Mosi-oa-Tunya / Victoria Falls World Heritage Site (State Parties, 2024), submitted to UNESCO under the signatures of Dr Mangwanya, Director General, Zimbabwe Parks and Wildlife Management Authority, and Mr Ndiyoi, Acting Executive Director, National Heritage Conservation Commission (Zambia) and covering the period 2022–2023, presents no information on new or proposed developments affecting the Inscribed Site or surrounding Buffer Zone. The actual wording, however, is strangely specific, stating ‘There are currently no proposed activities within the World Heritage Property.’

These two senior representatives responsible for the management of the Site seem to have forgotten that they are required to update the World Heritage Committee of new and proposed developments which may affect the site. While there may be no ‘new’ activities currently proposed within the World Heritage Site (with the exception of one significant long standing issue - tours to Cataract Island), there is a long list of tourism developments which have been proposed on both

sides of the river and which are actively in process, as well as several new tourism developments which were constructed during 2022–3, and which the State Parties have yet to formally disclose to the World Heritage Committee. In particular, following the long-delayed Reactive Monitoring Mission to the Site in February 2022 there has been a rush of developments on the southern, Zimbabwean, side of the Site all of which have yet to be disclosed to the Committee.



Fig. 1: Proposed and operational tourism developments within the Victoria Falls and Zambezi National Parks.

Map: keepvictoriafallswild.com

The following tourism developments, some proposed and some already constructed and operational, are all within the area of the Victoria Falls National Park and upstream Zambezi National Park (and which only allows ‘semi-permanent’ developments). They are also all along the ecologically vulnerable upstream riverside fringe and within the Highly Ecologically Sensitive Zone (HESZ) as designated within the 2007 and 2016 Joint Integrated Management Plans (State Parties, 2007; 2016). The HESZ is a strict ‘no new development zone,’ and has been managed as such for many decades prior to the Site’s World Heritage Listing. It should be of particular concern to the Committee that these long-standing protections have been eroded while under the ‘guardianship’ of the World Heritage Listing.

In addition to these developments there are also several other proposed and ongoing developments within the Buffer Zone surrounding the Site, in particular within the Road and Rail Transport Corridor (KVF, 2023b).

The Baines Restaurant (Zimbabwe)

It appears especially strange that Dr Mangwanya could forget such a controversial development as the Baines Restaurant, considering that his Authority is currently the subject of a legal challenge in relation to the development. Dr Mangwanya personally approved the development in a letter dated 22nd June 2021 and in which he incorrectly stated that the location was within the ‘Medium Ecologically Sensitive Zone’ and was therefore a permitted development, describing the proposal a

‘semi-permanent restaurant.’ It has subsequently been clearly illustrated that site is actually located within HESZ (KVF, 2023a).

The restaurant has meanwhile been constructed (with permanent concrete foundations and walls, landscaped lawns and car parking area) and opened in mid-2023, while the legal challenge remains bogged down in the courts (with the latest judge assigned to the case recently dismissed for corruption). The site is within 50m of the Falls and visible from tourist viewpoints. There was no public Environmental and Social Impact Assessment (ESIA) process in advance of the construction of this development. There has been no disclosure of this development through the State of Conservation Reports.

Cataract Island Tours (Zimbabwe)

Dr Mangwanya appears to have also forgotten to notify UNESCO of the launch of tours to Cataract Island, again located within the HESZ, in April 2022 - and an issue which has some history and clearly illustrates the State Parties reluctance to disclose information to the Committee. The current operator of these tours, Zambezi Crescent (managers of the Victoria Falls River Lodge - see below), first attempted to launch the activity in 2016, resulting in a letter to the State Parties requesting further details of the proposal, but “no response was received from the States Parties regarding the utilization of Cataract Island for tourism.”



Fig. 2: Lights from the newly constructed Baines Restaurant intrude over the view of the Devil’s Cataract in a picture taken at night on a special tour to experience the lunar rainbow (August 2023).

Photo: keepvictoriafallswild.com

This was followed by a specific request from the World Heritage Committee for details of the Cataract Island proposal, specifically requesting an ESIA for the proposal. In reply, in their 2018 State of Conservation Report, the State Parties dismissed concerns by stating that there had been no developments on the ground while committing to update the Committee on future developments. Despite these commitments the same operator re-launched tours to the island in April 2022 (two months after the Reactive Monitoring Mission) and continues to advertise and promote the activity (Victoria Falls Bits and Blogs, June 2022).

There has been no public ESIA process and no disclosure of this activity in the State of Conservation Reports. It is clear that the Zimbabwe Parks and Wildlife Management Authority have entered into an agreement with the operator for the use of this Island for commercial tours (in 2016) and yet have so far failed to disclose this agreement or address the concerns of the Committee.

The Rock Pool (Zimbabwe)

This development a short distance upstream of the Falls and again within the HESZ was first revealed with the construction of a brick building which appeared early in 2022, with the site since developed further with landscaped lawns and car parking areas. Again there has been no local public disclosure or stakeholder consultation regarding the development. A vague reference to formalising the use of sites along Zambezi Drive appeared in the 2018 and 2020 State of Conservation Reports, without giving specifics of the location or development.

The site is being managed by National Parks as a bar, braai (barbecue) and picnic area, with residents complaining of loud music and other disturbances late into the evening. There was no public ESIA process or stakeholder consultation for this development.

Riverside Tree Lodge (Zimbabwe)

This is another proposed development within the HESZ river corridor above the Falls. The developers claim to have secured a 25 year lease agreement for the site and publicised plans for a 57-room 'luxury lodge and spa.' Despite the lack of any disclosure to UNESCO relating to this development, there has been widespread publicity within the tourism sector, including hoteldesigins.com (October 2022) and forbes.com (December 2022).

Preparatory work has already been undertaken on the ground with the construction of a dirt access road in 2021. At the time it was claimed that a full ESIA had been conducted, yet there had been no public or stakeholder consultation on the development. There has been no disclosure of this development in the State of Conservation Reports.

Victoria Falls Resort (Zimbabwe)

In late June 2022 a 'massive' new riverside hotel and conference centre development, the Victoria Falls Resort, was announced by Victoria Falls Council (bulawayo24.com, June 2022). The proposed US\$50 million development, sandwiched between the existing A'Zambezi River Lodge and the new Palm River Lodge (just upstream of the Elephant Hills Resort), is planned to have more than 100 rooms and will include a narrow riverside fringe section which is again part of the HESZ upstream river corridor of the World Heritage Site, with the remainder of the site located within the surrounding Buffer Zone. Again this proposed development has yet to be disclosed through the State of Conservation Reports.

Victoria Falls River Lodge (Zimbabwe)

Located upstream of the Falls within the Zambezi National Park, this development opened in 2012 and is within the area of the WHS which the State Parties attempted to remove, without explanation, in maps presented in the 2016 Joint Integrated Management Plan (JIMP). Another lodge, the Old Drift Lodge, also within this area, was opened downstream of this development in 2018. It has since been clearly illustrated that the area is within the WHS and, again, with the HESZ (State Parties, 2022, Appendix 2a, p.2; Figure 11, page 39).

Since its opening in 2012 the Victoria Falls River Lodge has expanded significantly, opening tourism facilities on the nearby Kandahar Island in 2017 (again within the WHS and HSEZ) as well as the development of new riverside lodges in 2022 and 2023. None of these recent expansions have been disclosed through the State of Conservation Reports.

Kandahar Camp (Zimbabwe)

Another site, upstream of the Victoria Falls River Lodge but still within the WHS and HESZ, which has apparently been agreed as a tourism development concession by the Zimbabwe Parks and Wildlife Management Authority. The proposed development was disclosed by Dr Mangwanya himself in a radio interview in 2021 (Victoria Falls Bits and Blogs, February 2021) and a lease agreement is believed to have been signed. Yet again there has been no disclosure through the State of Conservation Reports.

Kakunka Island (Zambia)

The collective amnesia appears to have also spread across the river to Zambia, where plans to develop tourism infrastructure on Kakunka Island have also been forgotten. The island is located close to Kandahar Island in the upstream river corridor, and within WHS and HESZ. The development was partially notified to UNESCO in the 2020 State of Conservation Report, but only vaguely disclosed.

In the Appendices to the Report the proposal is identified as being within the 'High Ecologically Sensitive Zone' and the development detailed as 'Lodges and conference centre'. It is also recorded that "EIA Done and approved by Environmental Management Agency" (State Parties, 2020, Appendix 2a, p.3). Despite the above there has been no further information disclosed through more recent State of Conservation Reports.

Summary

The continued failure of the State Parties to fully disclose and report on developments within the WHS is perhaps not surprising considering the history of this Site, which has seen persistent misreporting and manipulation of information presented to the World Heritage Committee (KFW, 2023b). This pattern continues, as do the developments. The latest State of Conservation report also fails to give any annual tourist visitor numbers for 2022 and 2023.

The State Parties are shortly due to submit a new Joint Integrated Management Plan for the Site. The Committee should ensure that the plan fully discloses all current and proposed developments within the Site. If these are truly 'semi-permanent' developments then there should be no problem with their immediate removal and the restoration of these sites to their undeveloped and natural states. Plans for the development of the Riverside Tree Lodge and Kandahar Camp should be withdrawn, and tours to Cataract Island suspended. Failure to adequately address these issues will undoubtedly be seen by the State Parties as a green light to allow further development within the WHS and HESZ.

References

- bulawayo24.com (June 2022) US\$50m hotel for Victoria Falls - <https://bulawayo24.com/index-id-news-sc-national-byo-220794.html>
- hoteldesigns.com (October 2022) Six Senses to arrive in Zimbabwe: <https://hoteldesigns.net/industry-news/six-senses-to-arrive-in-zimbabwe/>
- forbes.com (December 2022) This Epic Victoria Falls Resort Is Set To Open In 2025 - <https://www.forbes.com/sites/johannaread/2022/12/30/this-epic-victoria-falls-resort-is-set-to-open-in-2025/>
- Keep Victoria Falls Wild (2023a) 2023 State of Development Summary Report - <https://keepvictoriafallswild.com/downloads/KVFW2023StateofDevelopmentSummaryReport.pdf>
- Keep Victoria Falls Wild (2023b) 2023 State of Development Final Report - <https://keepvictoriafallswild.com/downloads/2023VFWHSSStateOfDevelopmentFinalReport.pdf>
- State Parties (2007) 2007-2012 Victoria Falls/Mosi-oa-Tunya Joint Integrated Management Plan
- State Parties (2016) 2016 Victoria Falls/Mosi-oa-Tunya State of Conservation Report and 2016-2021 Victoria Falls/Mosi-oa-Tunya Joint Integrated Management Plan
- State Parties (2018) State of Conservation Report.
- State Parties (2020) State of Conservation Report.
- State Parties (2022) State of Conservation Report.
- State Parties (2024) State of Conservation Report.
- Victoria Falls Bits and Blogs (February 2021) ZimParks Under Pressure - <https://vicfallsbitsnblogs.blogspot.com/2021/02/zimparks-under-pressure.html>
- Victoria Falls Bits and Blogs (June 2022) Cataract Island Tours Threaten Victoria Falls World Heritage Status - <https://vicfallsbitsnblogs.blogspot.com/2022/06/cataract-island-tours-threaten-victoria.html>
- World Heritage Committee (2017a) Conservation issues presented to the World Heritage Committee in 2017 - <https://whc.unesco.org/en/soc/3562>
- World Heritage Committee (2017b) Decision 41 COM 7B.22.6 - <https://whc.unesco.org/en/soc/3562>
- Zimbabwe Parks and Wildlife Management Authority (June 2021) Application former Railway Water-Pump Station, Victoria Falls Long Term Lease. Letter from Dr F U Mangwanya, Director-General, ZPWMA, 22 June 2021 - [https://keepvictoriafallswild.com/downloads/ZPWMA-DG-June2021\(Q6\).jpg](https://keepvictoriafallswild.com/downloads/ZPWMA-DG-June2021(Q6).jpg)

Demand for Energy Puts the Wadden Sea at Risk

Deutsche Umwelthilfe
Aline Kühl-Stenzel, Naturschutzbund Deutschland
Frank Petersen, Waddenvereniging
Hans-Ulrich Rösner, WWF Deutschland



Nothing less than the health of one of the world's largest tidal wetlands is currently at stake. Shared between Denmark, Germany and the Netherlands, the Wadden Sea is a global biodiversity hotspot and one of Europe's most dynamic and wild ecosystems. This is reflected in the site's extraordinarily high level of protection, with UNESCO world heritage status from 2009 (with expansions in 2011 and 2014)¹, due to meeting three of the outstanding universal value (OUV) criteria: the depositional coastline of unparalleled scale and diversity (criterion viii), some of the last remaining natural large-scale intertidal ecosystems where natural processes continue to function largely undisturbed (criterion ix) and the floral and faunal diversity (criterion x).² However, despite this protective status, relevant parts of the Wadden Sea are in a poor environmental state.³⁴



Fig. 1: Natural dynamics in the Wadden Sea.

Photo: Markus Keller

In addition to already existent pressures from shipping, fisheries and pollution, the Wadden Sea is suffering from unprecedented levels of infrastructure development and exploitation for large-scale energy projects, as well as salt and sediment extraction. The demand for energy, fuelled by the Russian invasion of Ukraine, is a key driver for this drastic increase in project development. Another key driver is the climate crisis, leading to off-shore wind development with serious impacts on the Wadden Sea. For all these energy projects, there are more environmentally friendly alternatives: 1) to produce energy without fossil fuels via renewable energy and 2) to place the necessary infrastructure for renewables as much as possible outside the world heritage site in less ecologically sensitive locations, while also

mitigating the impact of the remaining ones. As long as these alternatives are not being implemented, they come at the cost of people and nature in the world heritage site.

United trilateral response by environmental NGOs

A coalition of nature NGOs from Denmark, Germany and the Netherlands has been closely monitoring progress in the property. We call for the urgent and complete implementation of Decision 45COM 7B.23 from 2023, as well as additional concerted action to address new developments. Key mandates are currently being ignored by Parties, such as para. 13c) to only authorise projects if they are shown to not adversely affect the OUV, and the clear mandate to stop specific projects (i.e., Ternaard and Mittelplate). Furthermore, we do not see evidence of the application of the UNESCO Guidance for Wind Energy Projects in a World Heritage Context (para. 12), for example given the misalignment in national nature, climate, and energy policies. At least in Germany, the Maritime Spatial Plan fails to consider the impact on the OUV of the Wadden Sea. While we appreciate that the Parties jointly submitted a State of Conservation Report in February 2024, most critical input from NGOs was neglected. The NGO coalition has therefore been sending several letters of alert to the World Heritage Centre. In February 2024, 22 NGOs wrote in response to the above-mentioned submission of the State of Conservation Report, including an Annex with detailed comments on the report⁵. The following projects and issues are of particular concern:

1. Fossil Project "Mittelplate" (DE)

As criticized in UNESCO decision 45 COM 7B.23, the Wintershall Dea company currently operates the oil platform "Mittelplate" in a dedicated fossil enclave in the centre of the southern Schleswig-Holstein property under a permit running until 2041 (see Fig. 2). While we appreciate that the regional government did not grant permission to a proposal to further expand exploitation in May 2024⁶, we severely criticize that Wintershall Dea is allowed to continue operating until 2041. The platform is already 36 years old, which increases the risk of an accident. The consequences of an oil spill would be disastrous to the ecosystem and its function: millions of waders, as well as harbour



Fig. 2: Overview of current fossil fuel projects in the German and Dutch Wadden Sea. Map: Deutsche Umwelthilfe

seals, grey seals and porpoises would lose their food source and livelihood in the mudflats.⁷ In line with the UNESCO decision, we call for a quick end of fossil fuel extraction in the property. The artificial enclaves for oil production within the Schleswig-Holstein and the Lower Saxony parts of the property should be fully included in the world heritage site, to close this loophole forever.

2. Fossil Project “GEMS” (NL-DE)

A consortium including the Waddenvereniging, Deutsche Umwelthilfe and the city of Borkum overturned the Dutch permission for the “GEMS” gas exploitation project, which has been

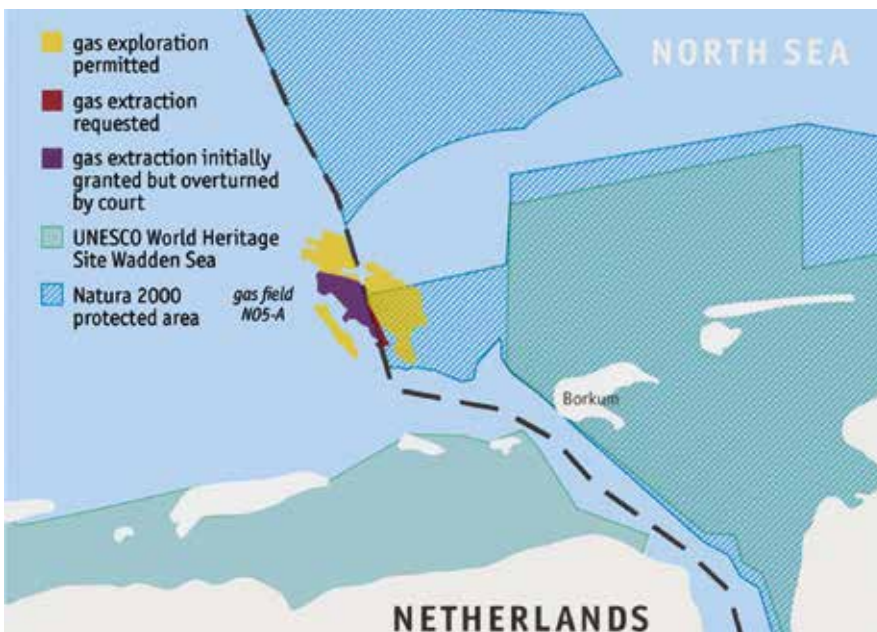


Fig. 3: Status of authorisation for exploration and extraction of the N05-A gas field within and close to the Wadden Sea WHS and the Natura 2000 protected area. Map: Deutsche Umwelthilfe

previously featured in the World Heritage Watch Report in 2022⁸ (see Fig. 3). The complete rejection of this project is however still pending in the Netherlands, and the permitting process is also still ongoing in Lower Saxony on the German side. The Dutch company ONE-Dyas, together with partners, aims to extract at least 13.6bn Nm³ over 10–35 years about 20 km from the islands of Schiermonnikoog and Borkum from the end of 2024. Environmental impacts are serious and include the destruction of a reef right next to the WHS, constant discharge of heavily polluted production water, widespread seabed subsidence, increased risks of earthquakes with the danger of destroying the freshwater lens below Borkum, disruption of fish migration and nitrogen emissions.⁹ The probability of an accident is exceptionally high.¹⁰

At least three OUV criteria would be permanently and severely compromised while the company plans to further expand its gas production in the area.¹¹

3. Fossil Project “Ternaard” (NL)

The fossil fuel company NAM is planning to extract gas near Ternaard in the Dutch Wadden Sea, with likely negative impacts not just including pollution and habitat loss, but also seabed subsidence, which is incompatible with actual sea level rise. We demand that the decision by the Dutch Parliament from 12.03.2024 to reform Dutch mining law to restrict mining activities¹² (fossil gas, as well as salt) will be adequately applied to stop the project going forward¹³. While we appreciate this decision by the Dutch parliament, we fear that it is still feasible that the project will go ahead and therefore call for a definitive cancellation.

4. Fossil Projects: LNG-Terminals (DE, NL)

Currently, there are three locations for the import of fossil Liquefied Natural Gas (LNG) operating or in construction in the Wadden Sea and its estuaries: Eemshaven, Wilhelmshaven (2 Floating Storage and Regasification Units [FSRU] & 1 planned onshore terminal) and Brunsbüttel (1 FSRU & 1 planned onshore terminal). They lead to increased pollution e.g. from oils, NO_x, SO₂, particulate matter, damage fish populations, and cause

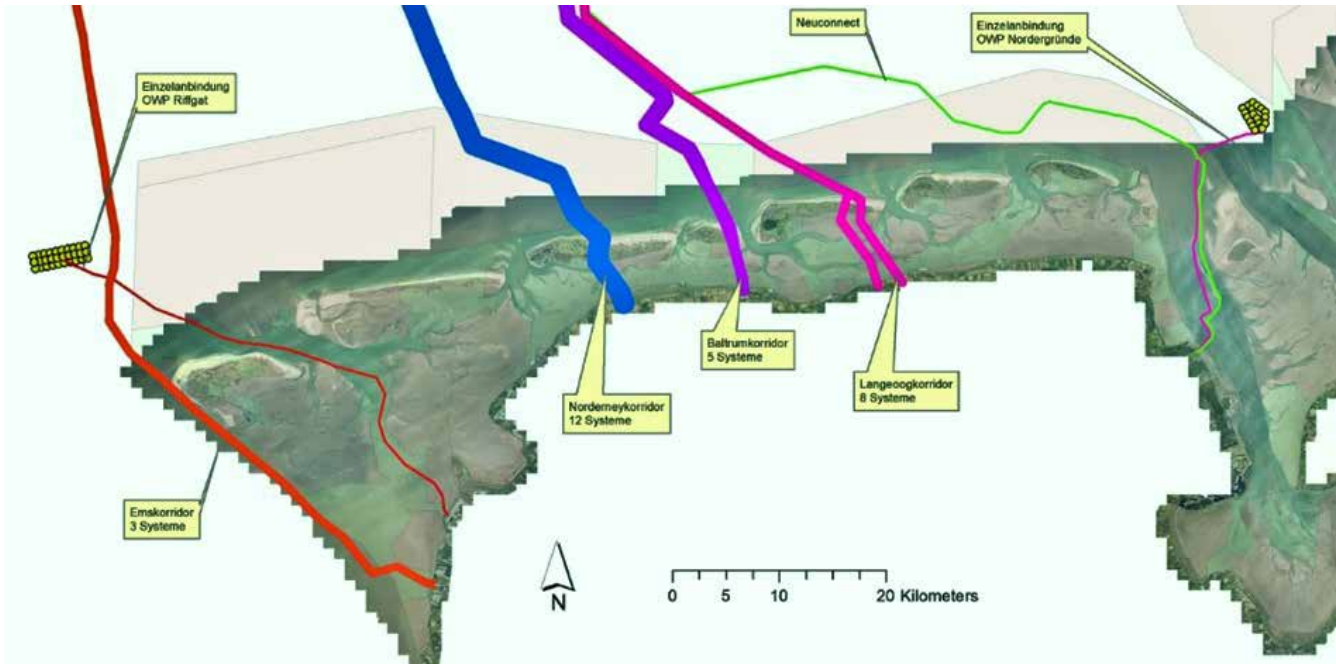


Fig. 4: Locations of the fossil projects "Ternaard" in the west and "Gems" in the east

Map: Amended from Map 1 in the State of Conservation Report: <https://www.waddensea-worldheritage.org/2024-report-state-conservation-world-heritage-property-wadden-sea-n1314>.

disturbances through increased ship traffic and construction. The floating terminal in Wilhelmshaven uses chlorine to clean its sea-water pipes, which is particularly damaging. A lawsuit by DUH is currently pending. Additionally, seawater is used to regasify the gas, which is then returned to the sea at a cooler temperature. Not only has the Wadden Sea ecosystem been damaged during the construction of the current floating terminals, but future expansion of the fixed onshore infrastructure will cause additional damage.¹⁴

5. Cable and pipeline routes within the property (DE, NL)

There are plans to drastically increase the number of high-voltage cable and pipeline corridors across the property. Germany alone aims to scale up the energy transferred through the Wadden Sea from offshore wind to the mainland from about 9,5 GW today to 66 GW in 2045, in addition to hydrogen and CO₂ pipelines¹⁵. In Germany, in the Lower Saxonian part of the WHS alone, 34 new corridors are planned in addition to the 14 existing ones and 3 offshore gates (see Fig. 4), further damaging pristine habitats critical for seals and birds. In the Netherlands, the first potential corridors for high-voltage cables and hydrogen-pipelines are being assessed, which might also damage pristine parts. The renewable infrastructure expansion must be implemented as sensitively as possible.

Given that alternative routes for cables and pipelines are available in already heavily damaged shipping channels, no further corridors should be designated and built within the property. Existing cable corridors (e.g., Norderney) should be upgraded to the new generation of 2 GW cables, whilst pushing the develop-

ment of non-invasive installation techniques (i.e., vibrating cable plough). Open trench installation (see Fig. 5) must be avoided at all costs.



Fig. 5: Open trench for cable installation.

Photo: Lower Saxon Wadden Sea National Park Authority

6. Selection of other harmful projects

- Renewable energy is critical to tackle the climate crisis, but the expansion of offshore wind in the North Sea to 120 GW by 2030 and 300 GW by 2050 is going to impact the property, especially seabird populations and migrating birds, harbour porpoises and overall underwater noise levels due to service and construction vessel traffic¹⁶.
- Salt mining continues to be a threat in the Netherlands, but new government regulation may lead to a halt.
- The deepening of estuaries and shipping channels for large ships to reach ports is leading to ever-increasing dredging and dumping volumes. Hamburg dumps large amounts of

polluted dredging material at “Neuer Lüchtergrund” close to the Wadden Sea and plans to dump much more directly at the edge of the WHS and west of Helgoland¹⁷.

- Fisheries across almost the entire Dutch and German part of the property, notably for shrimp and mussels, continues to have a severe impact on fish populations, the ocean floor and carbon emissions¹⁸.

Conclusion

The cumulative pressure on the Wadden Sea property is too high and incompatible with its World Heritage Status. We therefore call upon the World Heritage Committee to decide at its 46th session to:

- **Urge** the State Parties to implement Decision 45 COM 7B.23, notably to stop extractive activities in the vicinity or underneath of the property in particular the GEMS, Tenaard, Mittelplate and Ballastplaat projects and to authorise project proposals only if adequate assessments demonstrate no adverse impact on the OUV (section 13 c);
- **Request** the State Parties to reject any future proposals for extractive activities inside or in close proximity to the property;
- **Remind** State Parties that the joint Strategic Environmental Assessment must consider the cumulative impact of all pressures on the property, assess individual projects on a case-by-case basis, and provide clear advice on red lines and improvements;
- **Urge** the State Party of Germany to immediately stop the LNG projects in Wilhelmshaven and Brunsbüttel, and to stop the use of biocides at the Wilhelmshaven terminal;
- **Urge** Germany not to permit any dumping site for harbour sludge or other polluted sediment so that the OUV will be impacted, certainly not within or close to the property;
- **Urge** State Parties to not develop any new corridors for high-voltage cables, pipelines or other energy infrastructure inside the property (notably Baltrum, Langeoog), to minimize adverse impacts in existent corridors and to submit a trilateral assessment of the cumulative impact of cable, pipeline and linear infrastructure on the OUV of the property to the World Heritage Centre for review by IUCN prior to a final decision on the projects;
- **Call** upon the State Parties to scope and explore safe corridors for cables and pipelines underneath existing shipping lanes using non-invasive techniques as a means to speed up the much-needed European energy-transition;
- **Call** on Germany to nominate the remaining enclaves originally foreseen for fossil fuel extraction for inclusion in the property as soon as possible.

Notes

- 1 Additional protection levels for parts of the site include listings as a Ramsar site, National Park, Natura-2000 site, UNESCO MAB biosphere reserve, Particularly Sensitive Sea Area (PSSA) under the International Maritime Organization, fisheries exclusion and whale conservation zones
- 2 <https://whc.unesco.org/en/list/1314>
- 3 <https://www.ospar.org/work-areas/cross-cutting-issues/qsr2023> ; <https://qsr.waddensea-worldheritage.org/>
- 4 <https://qsr.waddensea-worldheritage.org/reports/breeding-birds>; <http://docs.dpaq.de/17231-fmars-07-606609.pdf>
- 5 https://www.nabu.de/imperia/md/content/nabude/meeresschutz/240228_ngo-joint-letter_state-of-conservation.pdf ; https://www.nabu.de/imperia/md/content/nabude/meeresschutz/240228_ngo-joint-letter_state-of-conservation_annex.pdf
- 6 https://www.schleswig-holstein.de/DE/landesregierung/ministerien-behoerden/v/Presse/PI/2024/05/240507_Wintershall_Dea.html?n=2309ee6f-8d32-4a05-8272-354fb9fd297d; <https://www.duh.de/presse/pressemitteilungen/pressemitteilung/fossile-plaene-von-wintershall-dea-gestoppt-deutsche-umwelthilfe-begruesst-absage-neuer-oel-bohrungen-im/>
- 7 <https://www.klimareporter.de/deutschland/das-russland-argument-sticht-im-wattenmeer-nicht>
- 8 P. 38 onwards: <https://world-heritage-watch.org/content/wp-content/uploads/2022/11/2022-Report-WHW-final.pdf>
- 9 <http://bi-saubere-luft-ostfriesland.de/09-12-2022-einwand-zur-richtbohrungen-n05-a-in-den-deutschen-sektor-der-nordsee-einschliesslich-der-erdgasfoerderung-im-deutschen-hoheitsgebiet-der-one-dyas-b-v/> ; https://www.duh.de/fileadmin/user_upload/download/Pressemitteilungen/Energie/Thema_Gas/221209_DUH_Einwendung_Borkum_Richtbohrungen_final.pdf
- 10 <https://www.duh.de/presse/pressemitteilungen/pressemitteilung/einwendung-eingereicht-deutsche-umwelthilfe-fordert-sofortigen-stopp-der-gasfoerderungsplaene-vor-nor/>
- 11 <https://www.gemsnorthsea.co.uk> ; <https://www.duh.de/presse/pressemitteilungen/pressemitteilung/neue-test-gasbohrungen-vor-borkum-deutsche-umwelthilfe-geht-gegen-verfahrenswidrige-genehmigung-vor/>
- 12 <https://www.omropfryslan.nl/nieuws/16353129/tweede-kamer-wil-in-toekomst-geen-winning-van-gas-en-zout-in-waddenzee>
- 13 <https://waddenvereniging.nl/nieuws/einde-gaswinning-en-zoutwinning-onder-de-waddenzee-nu-vastgelegd-in-de-wet/>
- 14 <https://www.duh.de/lng/> ; <https://energy-terminal.de/de/terminals>
- 15 <https://www.government.nl/documents/diplomatic-statements/2023/04/24/ostend-declaration-on-the-north-sea-as-europes-green-power-plant>
- 16 <https://www.government.nl/documents/diplomatic-statements/2023/04/24/ostend-declaration-on-the-north-sea-as-europes-green-power-plant> ; <https://www.nabu.de/natur-und-landschaft/meere/offshore-wind-parks/33162.html> ; <https://www.nabu.de/imperia/md/content/nabude/energie/wind/230822-ampelstudie-english-summary-nabu.pdf>
- 17 <https://blogs.nabu.de/naturschaetze-retten/wp-content/uploads/sites/3/2024/01/20231206-Stellungnahme-Baggergut-NABU.pdf>
- 18 <https://qsr.waddensea-worldheritage.org/reports/fisheries>

Spring Rains and Paper Plans are not Enough to Save Doñana from New Threats

Teresa Gil Gil and Juanjo Carmona, WWF Spain



The Doñana natural protected area is internationally recognised for its marshes, a sanctuary for migratory birds from northern Europe and northern Africa. However, what really makes Doñana unique, in reality, is its aquifer. An aquifer that previously ensured flows to the streams that filled the marsh and maintained more than 3,000 water bodies both inside and outside the protected area. There are water bodies from permanent lagoons such as Santa Olalla to areas with very diverse temporality and surface areas such as pools, artificially deepened lagoons (*“zacallones”*), and other ponded areas like *“navazos”* and *“ojos de la marisma”*.

Unfortunately, Doñana is experiencing its worst moment ever due to the combination of water overexploitation and climate change. Scientific data from research organisations such as the Doñana Biological Station (Estación Biológica de Doñana; EBD), and technical reports from authorities including the Guadalquivir River Basin Authority (Confederación Hidrográfica del Guadalquivir; CHG) are objective and irrefutable proof of how poor Doñana’s conservation status is, in addition to rulings such as the one issued in 2021 by the European Court of Justice, condemning Spain for failing to comply with the Water and Habitats Directives in Doñana.

Science shows that Doñana is on the way to collapse

In February 2024, WWF presented the report “Science to save Doñana. Evidence of its ecological degradation in 2024”, an exhaustive review of scientific evidence on the current deterioration of the natural protected area, carried out in collaboration with scientists from the main Spanish research organizations and several universities. The report warns that current pressures have triggered a “domino effect” of biodiversity loss that is taking Doñana to a point of no return.

All scientific evidence points to the fact that it is the overexploitation of water, together with the irrational growth of legal and illegal irrigation, aggravated by the supply in Matalascañas, the reasons for the deterioration of this wetland, unique in the world, causing the plummet of its biodiversity, as reported by the Doñana Biological Station in its Doñana Protected Natural Area monitoring report.

Furthermore, low flooding in marshes and lagoons has led to low numbers of wintering waterfowl and has caused the decline in populations of breeding waterfowl and other animal species, especially amphibians and fish, to continue. The general situation is also bad for the rabbit, on which many carnivores and birds of prey depend. Another study led by the **Doñana Biological Station** and the **Geological and Mining Institute of Spain**, has reviewed more than 70 studies related to groundwater and the state of conservation of Doñana and has shown that there is extensive scientific evidence of the serious impacts caused due to excessive extraction of water from the aquifer.

Likewise, the Guadalquivir Hydrographic Confederation in its report on the Ecological Status of Doñana’s aquifer (Hydrological Year 2022–23) confirms the unstoppable and serious deterioration of Doñana. These data confirm that the aquifer is at its worst historical moment since there are records and not only is it not recovering, but it is getting worse. Given this irrefutable facts, international organizations such European Commission, UNESCO, Ramsar or IUCN, have a clear understanding of the problems affecting Doñana. Now is time to firmly demand and promote an ecological transformation of the surrounding territory and give back the water Doñana requests.

Almonte-Marismas aquifer is on red alert, overexploited without a management plan

Decades of overexploitation, mainly linked to the expansion of industrial agricultural production for export, have caused groundwater levels in the Almonte-Marismas aquifer to fall to historic lows or values close to these in more than half of the monitoring piezometers. This report also confirms that Doñana has gone through 12 years without a wet year, and the heat has raised the average annual temperature to new historical record.

The situation of overextraction of water from the aquifer is so serious that for the second consecutive year, all the lagoons of the National Park have dried up, including Santa Olalla, which is the first time in history that this has happened since data has been available. To date, and despite the seriousness of the situation in Doñana, it is still unknown how much water is actually

extracted from the aquifer. However, according to all the existing scientific evidence, it can be concluded that more water is extracted than is recharged.

Despite the poor state of the aquifer, the Water extraction plan required by the Water Law has still not been developed. It's near two years late. In most of the sectors of the aquifer, more water is being extracted than the water replaced by the rain. It is more than urgent that the water authority will approve and implement the Water extraction plan.

Illegal irrigation in Doñana remains above 1000 hectares

This 2023–2024 season 1,360.2 hectares are still being irrigated illegally or without irrigation rights and around 9 hm³ of water is being extracted in excess of the maximum volume that would guarantee the recovery of the aquifer. Of these 9 hm³, 6 hm³ corresponds to irrigation outside the SAR and the remaining 3 hm³ represent over-extraction just from legalised plots. Water continues to be extracted illegally from the aquifer, which further increases the problems of overexploitation and water quality in the water bodies on which Doñana depends.

Faced with this problem, the regional government has practically paralyzed the “Strawberry Management Plan”. While it is true that the national administration is closing wells, the illegal hectares that open new wells to continue their activity are not closed. To solve this problem, it is necessary to urgently carry out precautionary closures of illegally irrigated hectares, as a way to prevent the plundering of the aquifer and the economic benefits from the sale of illegal strawberries.

Although in December 2023 the regional government publicly announced that the Law Proposal to modify the “Strawberry Plan” would not be approved, the reality is that this proposal is frozen in the regional Parliament and has not been completely withdrawn. The regional government of Andalusia is still trying to modify the plan through different ways, arguing that the technical document needs to be improved. Irrigated areas with no water rights are being consolidated, creating false expectations among illegal irrigators, mainly due to the continuous proposals to modify the Strawberry Special Plan put forward by the Andalusian Regional Government.

Doñana is losing its biodiversity and its IUCN Green List certificate

All these impacts are causing a progressive and alarming decline in biodiversity in Doñana, as not enough water - neither groundwater nor surface water - is reaching the aquatic and terrestrial ecosystems that need it to survive.

The consequence of this is the dramatic reduction of key indicators, such as the death of century-old cork oaks, which need high water tables to feed their roots, the loss of amphibian spe-

cies due to the disappearance of lagoons and the reduction in the surface area of the marsh, which has gone from an average of 4.3 species per km² in 2003 to 2.5 species/km² in 2021; and the disappearance in 40 years of 28 species of dragonflies and damselflies, species that act as indicators and depend on aquatic ecosystems to develop their larvae.

In addition IUCN has officially communicated to the regional government of Andalusia that Doñana’s Green List certificate was suspended on June 30, 2022, and at this moment is in the phase of candidacy. Losing the recognition of good management practices is an indicator that means that Doñana protected area needs to improve its management in order to reach again the Standard that certifies and recognises achieving ongoing results for people and nature. It is essential that communication in relation to this situation is clear and coherent in order to avoid ambiguities and misunderstandings.

The rain this spring would not solve the invisible problem of the overexploitation of groundwater

During March 2024, 145.3 l/m² have been collected, most of it during Holy Week. The rains arrive late for wintering, but will still be useful for breeding waterfowl. This figure exceeds that of the previous three years at this time, but still does not reach the historical average per cycle, greater than 500 l/m².

Normally, the rains in Doñana are concentrated in autumn and winter, but this last year they have arrived later. This March has been the second rainiest since records have been kept. However, during this hydrological cycle, rainfall during the previous months has been quite scarce and has caused, for example, very low numbers to be recorded in waterfowl censuses during wintering (206.859 birds).

Temporarily, the rains have partially alleviated the most immediate drought problems, but they do not solve the invisible problem of the overexploitation of groundwater. We will have to wait for the evolution of precipitation and temperatures in the coming months to assess their overall effect.

The reopening of Aznalcollar’s mine is approaching

The opening of the mine continues despite the existence of a criminal procedure that will be heard in 2025 and the impacts that the mine's discharges may cause in the Guadalquivir Estuary. The regional government intends to approve the discharge of 80,000 million liters of toxic water from the Aznalcóllar mine over the next 18 years. The content of heavy metals such cadmium, lead, arsenic and mercury in the water will not only have an immediate environmental impact on the local fauna and flora but will also affect health and food safety of local communities.

Challenges and Uncertainties Continue for the Aeolian Islands' World Heritage Site

Francesco Vettore, Claudia Romagnoli, Pietro Lo Cascio

The Aeolian archipelago, an extraordinary example of an active volcanic arc, is composed by seven main islands and other small islets (Fig. 1). It has been inscribed in the World Heritage List in 2000 (site n.908) for the contribution in volcanology studies (natural criteria, viii), being the type locality for two kinds of volcanic activity: "strombolian" and "vulcanian" eruptions.

The recognition was granted following a nomination process in which the State Party (Italy) originally proposed the Aeolian Islands as mixed site (cultural and natural criteria). However, despite the archeological diversity preserved on the islands is rich (the archipelago was colonized since the Neolithic period, 6th millennium B.C.), it was evaluated by ICOMOS (advisory body of UNESCO for cultural properties) as highly "impacted by modern intrusions linked with the growth of tourism", discouraging the recognition for cultural values. The IUCN noted the potential of the site for meeting natural criterion (viii), but firstly deferred the nomination back to the State Party requiring further information on protection and management issues. Supplementary information about the Landscape Territorial Plan (P.T.P.)

and simplified site boundaries were welcomed positively, and it was thus inscribed in the World Heritage List as *the first site for a natural criterion* in Italy.

The pumice quarries issue

Among sectors seat of recent volcanic activity, at Lipari the latest eruptive phase, dated at 760 A.D.-1220, generated the pumice cone of Monte Pilato and the Rocche Rosse obsidian lava flow, in the NE part of the island.

The peculiarity of the area is given by the rarity of the pumice, the extraordinary ecological habitat, and the historical and anthropological values that forged the identity of the islanders for centuries. Responding to the need of increasing the production, pumice extraction methods switched from hand excavation in tunnels to open-cut excavation using mechanical means, causing serious impact on the landscape (Fig. 2) and resulting in a significant reduction in the number of excavation workers. Despite the lowering value in the overall economy of the island,

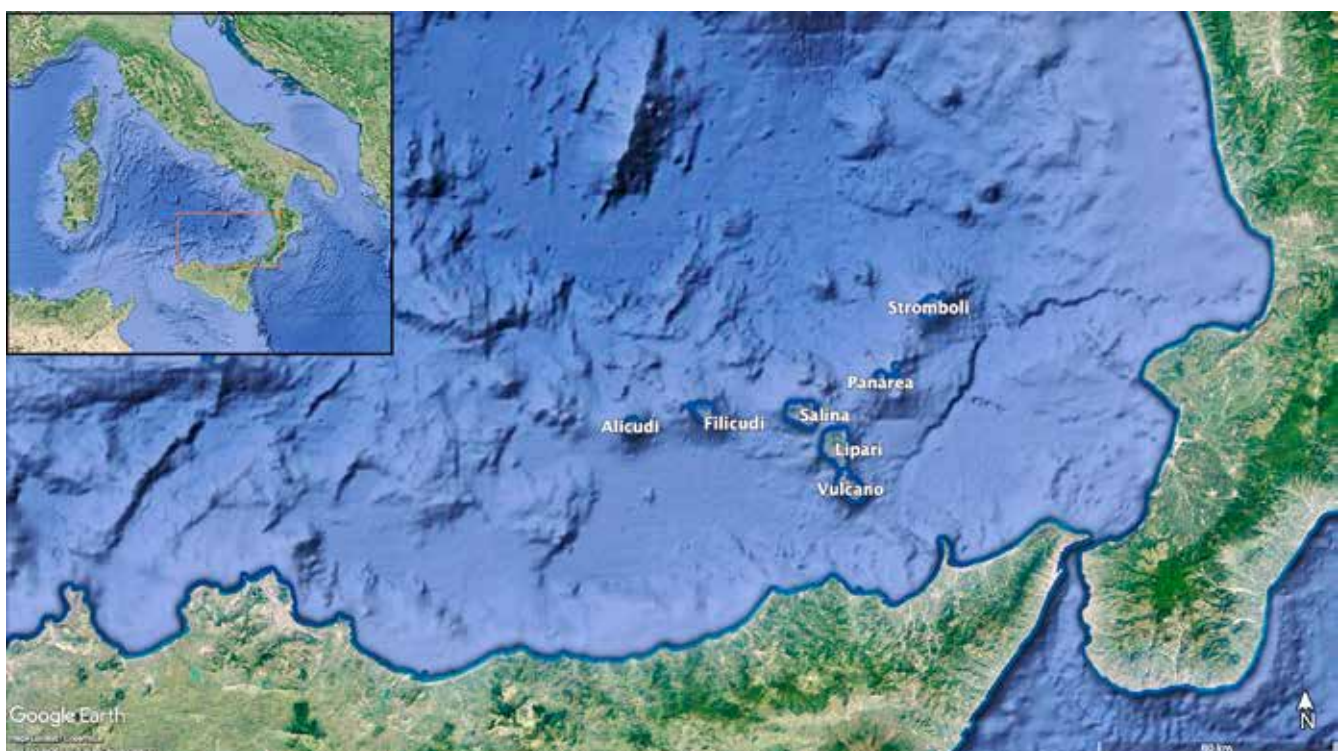


Fig. 1: The location of the Aeolian archipelago in the Southern Tyrrhenian Sea.

[Satellite image: Google Earth



Fig. 2: The altered morphology of Monte Pilato, due to extensive exploitation of the pumice. Site 1: Campo Bianco – Porticello. Site 2: Acquacalda. Satellite image: Google Earth

gradually shifting to a tourism-based type, the pumice exploitation did not stop. This was in contrast with the initial referral of the WH nomination and led the World Heritage Committee, with concern for the deferment of any instrument for the site management, to urge the State Party to prevent the further expansion of pumice extraction¹ and “to seek long-term solutions towards a closure of the existing quarries”. The integrity, which a WH property must uphold within its boundaries was on the edge of being infringed.

The mining activity continued until August 2007, when the Catania’s judiciary disposed the closure of the area (*Campo Bianco – Porticello* and *Acquacalda*), seized the boarding piers and owned machinery, and ordered a ban on further future mining initiatives. In 2021, after 14 years during which the area intensively degraded, and several projects for its reconversion have been drafted but never become effective, the Sicilian’ regional administration took steps forward for the redevelopment of *Campo Bianco - Porticello* area as a geosite and “Museum of the pumice”, as previously suggested by IUCN. However, the proposal of the Sicilian region to acquire the area did not materialize and *the historical and ethno-anthropological constraint* was judged lawless in 2022 by the Sicilian Administrative Court (TAR). At the current stage, the two sites encumber in a state of disrepair and abandonment, exposing the whole area to a marked erosion due to slope instability, requiring the enforcement of a closing ordinance for the related coastal tract.

The area necessitates an extensive environmental remediation, that could be compounded with the valorization of the former industrial complex for the purpose of an *en-plein air* museum and geo-mineral park. In fact, according to the P.T.P., only scientific research and cultural, educational, and informational activities could be permissible in the area. It excludes not only the extraction activities but also any commercial, residential or accommodation businesses.

Threats to the natural heritage

The islands’ natural heritage is exposed to several threats, including over tourism. The Aeolian archipelago is now inhabited by almost 900 taxa of vascular flora, representing almost



Fig. 3: The abandoned infrastructures of the old quarries in Porticello.

Photo: Francesco Vettore

the 17% of Italian flora's diversity, despite its areal extension represent only the 0.038 % of the Italian territory². Due to the relatively young age of the archipelago, as well to its proximity to the mainland and Sicily, there are few endemics, but they include some interesting paleo-endemics of high conservation values. Some areas of the archipelago are of crucial importance for the migration or reproduction of several bird species listed in the annex of European Directive 147/09, and also host populations of animal species of high conservation interest³. Plant and faunal communities are however threatened by the pervasive human modification and disturbing events occurring on a recurrent basis. For example, on 25th May 2022, the island of Stromboli suffered a severe arson that burned almost half of the vegetated area of Stromboli.

The event strongly affected the island biota, destroying the spontaneous vegetation rich in species of relevant biogeographic interest, in favour of perennial grass of alien origin (*Saccharum biflorum*) that instead showed a very high vegetative performance after burning⁴. Preventing major anthro-

pogenic disturbance would limit the establishment and spread of alien-dominated vegetation, favouring the recovery process of native plant communities (e.g. *Cytisus aeolicus*⁵, a narrow ranging endemic broom growing only on the islands of Vulcano, Alicudi and Stromboli⁶). This event had also devastating consequences for the inhabitants and infrastructures on the island. Furthermore, on 12th August 2022 due to the reduced hydro-geological stability caused by the fire, the occurrence of an extreme rainfall event induced extensive sliding and debris flow also affecting the island's villages.

Since the 1960s and the Italian economic boom, the Aeolian Islands progressively became a major touristic destination, and this induced a severe anthropization. The Aeolian economy is currently based on tourism; however, it is strongly subjected to seasonal demand with high concentration of visitors in certain months of the year, creating several issues of environmental and social impact. The tourism fruition of the islands' heritage lacks a proper planning, as demonstrated by the fact that (apart from Stromboli volcano) the major sites for geological relevance are not yet established or well promoted, despite their recognized peculiarity. A major discussion is represented by the phenomenon of daily tourism from neighboring islands and mainland, which hardly adds value to the islands' economy, but puts too much pressure on their facilities.

When the alert level of the La Fossa' volcanic system on the island of Vulcano was raised in 2021–2022 due to increased degassing and deformation, several disruptions were complained by the local stakeholders, notably for the partial evacuation and the subsequent interdiction of the crater summit path and the main beach below, the two main "touristic sites" of the island. The general perception by Vulcano inhabitants of a low-risk volcano stemming from its state of quiescence in the last century⁷, however, should not lead to underestimation of the potential risk of some areas. Accordingly, Vulcano Island possesses a variety of other peculiar sites that could be promoted in a more deseasonalized and resilient touristic offer.



Fig. 4: The burn scar on Stromboli on the north-eastern side of the island.
Satellite image: European Union, Copernicus Sentinel-2 imagery



Fig. 5: "Punta Labronzo" on the N side of the island. (a) June 2021 and (b) June 2022 after the arson.

|Photos: Francesco Vettore

The unaddressed recommendations related to the management

Site n.908 has been discussed over the years at 10 different sessions of the World Heritage Committee, from 1999 until 2010. In 2007 a Joint UNESCO-IUCN Mission visited the archipelago for a comprehensive evaluation of the state of conservation of the site, that resulted at the 31st session in 9 recommendations delivered with decision 31 COM 7B.24. At the 32nd session the WHC urged the State Party to recall and fully address the unanswered recommendations from b) to i), notably about the management and governance of the site. At the 33rd session, the WHC welcomed the progress in the potential establishment of the National Park, which managing body could have controlled the WHS, and the on-going draft of the Management Plan. Despite this, the National Park has still not been established and the Management Plan published in 2008 has remained ineffective.

In the Periodic Reporting Cycle 2 of 2014 the absence of the managing body was acknowledged: *“It is necessary to establish an institution to manage the site Aeolian Islands.”* After a long time of total inactivity for all parts involved, in 2023 the municipality of Lipari updated the information given in the periodic reports sent to the Ministry of the Environment and Energy Security, as well as the maps of the Site (now available on Technical Regional Charts). Furthermore, in agreement with the other municipalities of the archipelago, it would like to formalize the steering committee (composed by mayors, following the indications of the Management Plan) and the nomination of a technical-scientific committee.

Advancing the WH recognition in a holistic approach

The IUCN in the 2014 report, spoke in these terms about the Aeolian Islands site: *“There is much confusion as to what World Heritage designation means, and ignorance regarding the benefits of the World Heritage status.”* The potential of the site has been widely misunderstood by the population. An interviewed local stakeholder commented: *“It has been like the opportunities flew above our heads, and we have not been able to catch them.”* In fact, for the past two decades most stakeholders have been somehow oblivious to the inherent benefits of the recognition, and portrayed it as an obstacle rather than an added value to people’s lives, considering only the limitations imposed by the WH framework and protected areas more generally. The difficult reception, however, could be possibly overcome with a proper management of the site and a better valorization of the site’s values and potential.

For example, an appropriate funding scheme has been designed by the Italian government with the law 77/2006 that aims at providing financial support, on an annual basis, to activities for the promotion, protection, and enhancement of Italian WH sites and their organizational structure. However, since



Fig. 6: The phenomenon of daily tourism on the island of Vulcano.

Photo: Francesco Vettore

its establishment, the site “Aeolian Islands” did not directly receive any funds, due to the absence of a coordinating body that could present the request. It is of crucial importance that the site will succeed in: *“Designate an appropriate management entity and ensure appropriate funding”* as pointed out already in 31 COM 7B.24. We therefore call on the World Heritage Committee to recommend in its 46th session to:

Urge the State Party to take action and demand the Sicily Region to enforce the landscape constraint for the areas previously occupied by the pumice quarries, to institute the geosite and to acquire the areas, allowing the environmental remediation and the valorization of the former production complexes. Require the State Party to report on the formalization of the operating managing body, that would involve a technical-scientific committee as proposed by the local administrations.

We acknowledge the complexity of the re-nomination process but, given the high biodiversity value and its limited protection at current stage, we require the WHC to urge the State Party to consider the renomination for biological criterion (ix) in the long-term planning as a catalyzer for more effective conservation measures, as originally proposed in 2007 with the recommendation i) of decision 31 COM 7B.24.

Notes

- Several recommendations were addressed in the reports of the WHC: 26 COM 21B.13; 27 COM 7B.18; 28 COM 15B.26; 30 COM 7B.23; 31 COM 7B.24.
- IUCN, “Isole Eolie (Aeolian Islands) 2020 Conservation Outlook Assessment”
- Lo Cascio P., 2017. Luoghi di natura e di Sicilia. Le Isole Eolie.
- R. Guarino et al., “Remote sensing reveals fire-driven facilitation of a C4 rhizomatous alien grass on a small Mediterranean volcanic island”, 2023, <https://doi.org/10.5194/bg-2023-19>
- Considered endangered in the IUCN Red List: <https://www.iucnredlist.org/species/162068/120516087>
- Zaia et al., “Staying alive on an active volcano: 80 years population dynamics of *Cytisus aeolicus* (Fabaceae) from Stromboli (Aeolian Islands, Italy)”, *Ecological Processes*, 9(1), 1–15, <https://doi.org/10.1186/s13717-020-00262-5>, 2020
- Malaguti et al., The contribution of palaeomagnetism, tephrochronology and radiocarbon dating to refine the last 1100 years of eruptive activity at Vulcano (Italy). *Bull Volcanol.*, 2021, <https://doi.org/10.1007/s00445-021-01515-7>

The Western Caucasus Remains One of the Most Threatened Sites

Anonymous authors

The Western Caucasus has remained to be one of the most threatened World Heritage sites for years. The issues described in the World Heritage Watch Report 2023 remain relevant.

Proposed railway and highways across Caucasus Reserve

Plans for the construction of a railway and highways between the proposed Lagonaki resort (Republic of Adygea), the Arkhyz resort (Karachaevo-Cherkessia Republic) and resorts around Krasnaya Polyana (Krasnodar Region) continue to be actively discussed in 2023.

On April 6, 2023, Russian Prime Minister Mikhail Mishustin announced that the construction of the Lagonaki – Sochi – Arkhyz road was approved by the President.¹ On May 3, A. Tkachev, the former governor of the Krasnodar Territory and one of the beneficiaries of the construction of the resorts, mentioned that in 2022 a well-known expert, Chair of the Coordination Commission for the Olympic Winter Games in Sochi Jean-Claude Killy came to Lagonaki. According to Tkachev, Jean-Claude Killy flew around the territory by helicopter and noted that if they connect three resorts, they will get a cluster (550 km of trails) comparable to the French ski resort “Three Valleys”. Jean-Claude Killy presented this idea to the President of Russia.²

It became known that in 2022, the President of the Russian Federation issued instructions to consider the possibility of building the Arkhyz – Krasnaya Polyana, and the Lagonaki – Krasnaya Polyana highways. Roads have already been included in the draft General Plan of Sochi.

At the moment, the possibility of building a section of the Arkhyz – Krasnaya Polyana road that falls within the boundaries of the reserve in the form of a 13-kilometer tunnel is being discussed.³ In November 2023, a representative of Federal Road Agency reported that the possibility of conducting engineering surveys on the territory of the reserve for the preparation of project documentation was being worked out.

Even if the road is laid through the territory of the reserve as a tunnel, it will split the adjacent Sochi Wildlife Refuge and Sochi National Park, which form a single natural territory with the reserve.

The ongoing development of resorts in Sochi National Park

In June-July 2023, logging was carried out in the Sochi National Park, near the boundaries of the property. Almost on the Mzymta River banks in the territory leased for the “recreation activities” the company Turyev Khutor Development LLC carried out clear-cutting.

In September, the First Deputy Prosecutor General of the Russian Federation appealed to the Adler District Court of Sochi with a claim for compensation for damage caused to forests and soils. The lawsuit notes that clear-cutting of especially valuable tree plantations (Caucasian fir, alpine maple, black alder, oriental beech) was carried out, as well as illegal removal of a fertile soil layer. It is also indicated that these illegal activities were carried out for the purpose of further construction of buildings for the recreational purpose (apart-hotels, hotel complexes, buildings for staff). The company has not received the necessary permits. In addition, logging in the national park is generally not allowed for such purposes.

However, in November, the Prosecutor General’s Office of the Russian Federation and the Turyev Khutor Development LLC concluded a conciliatory agreement. The company will pay 2.5 billion rubles. To compensate for the negative impact received, the Sochi National Park will receive only 100 million rubles, and moreover, this amount should also cover compensation from the “subsequent operation of the infrastructure” of the resort.⁴ Thus, no decision has been made that would allow preserving the fragile ecosystem of the national park. Vasta Discovery Director Sergey Bachin said that construction of the first cable car of the new resort will begin in 2024.⁵

The draft new Regulation on the Sochi National Park, prepared in the summer of 2023, also shows the planned expansion of resorts. According to it, the maximum percentage of development in the recreational and economic zones of the national park can be 40%. Since the economic and recreational zones of the national park occupy more than half of its total territory, the adoption of the new Regulation may entail the construction of up to 20% of the territory of the Sochi National Park. This also applies to the lands directly bordering the World Heritage prop-

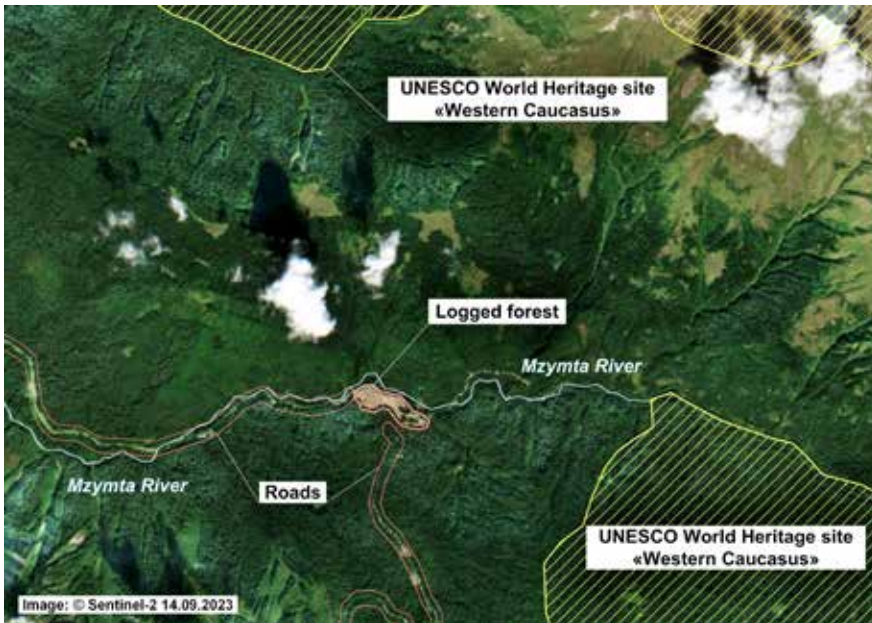


Fig. 1 and 2: Clear-cutting carried out in the National Park in June-July 2023.

Map and photo: The authors

erty. In particular, the development threatens the areas of the Aibga ridge that are least affected by anthropogenic impact.

The draft Regulation also makes it possible to carry out sanitary clear-cutting in the strictly protected and specially protected zones of the national park, including the Grushevy Ridge. Part of the territory of the Grushevy Ridge was planned to be transferred to a recreational zone, which can be built up to 40%.

The construction of the Vasta Valley resort is also included in the draft General Plan of Sochi. The construction of its facilities is planned on the Turi Mountains which form the border of the Caucasus Reserve and the Sochi National Park, and are very important for the conservation of populations of the West Caucasian tura, Caucasian chamois, Caucasian red deer, and brown bear.

The World Heritage Committee has repeatedly expressed its position on the construction of large-scale tourist infrastructure in the areas of the national park adjacent to the boundaries of the World Heritage site.⁶

Construction of a ski resort on the Lagonaki plateau

Geodetic works were carried out, wind measurement sensors were installed, and ski slopes were marked in August 2022. After the publicity and intervention of The Federal Supervisory Natural Resources Management Service, the illegal marking was removed.⁷

An access road to the resort has already been built⁸. An electric substation for the resort is under construction.⁹ Design materials are ready for the construction of a water pipeline, a sew-



Fig. 3: Wind measurement sensors on the Lagonaki plateau.

Photo: The authors



Fig. 4: Ski slope marking on the Lagonaki plateau.

Photo: The authors

age disposal station,¹⁰ an electric network and first hotels.¹¹ The land plot for the construction of the first hotels ("Upper Village") has been transferred from the lands of the Forest Fund to the lands of settlements,¹² the cutting of trees on it and the construction of hotels will begin this year.¹³

In total, 62 ha of forest and 28 ha of alpine meadows with rare plants are planned to be developed for the resort. It is also plan to intake and drain 8,600 m³ of water per day from the resort,

build two reservoirs, two hotel villages, dozens of ski slopes, a golf club, a bike park.¹⁴



Fig. 5: Electric substation under construction.

Photo: The authors

It should be considered that 213 biologists¹⁵ and 76,000 citizens¹⁶ opposed the construction. In 2023 alone, scientists and activists noted more than 1,000 points of growth of 50 rare plant species on the territory of the planned resort¹⁷. In total, scientists count more than 200 rare species of plants and animals on the territory of the Lagonaki plateau. The inadmissibility of the construction of large-scale tourist infrastructure on the Lagonaki plateau is the most mentioned in the decisions of the World Heritage Committee on the property – 2008, 2011, 2013, 2014, 2016, 2017, 2018, 2019, 2021, 2023.

Plans for the construction of the next ski resort “Zikhiya”

The next planned ski resort on the territory of the property is “Zikhiya”. This project, as well as the Lagonaki resort, is included in the national Tourism and Hospitality Industry Project and the “Economic Development Strategy of the Republic of Adygea until 2030”¹⁸.

The master plan contains ski slopes and cable cars on the northern and northwestern slopes of Mount Guzeripl, the northern slopes of Mount Oshten. The construction of a hotel town is planned on a site that was previously apparently withdrawn from the Caucasus Reserve¹⁹.

Downgrading of the protected status of natural monuments

As we reported earlier, the protection of natural monuments River Tsitsa Headwaters and Headwaters of Pshekhka and Pshekhaskha Rivers was downgraded. Economic zones were established where it became possible to build linear and hydraulic structures, develop minerals, etc. Two branches of the main water pipeline with numerous logging and environmental violations were erected in these natural areas.

Economic development continues. Plans to build a reservoir on the territory of the River Tsitsa Headwaters Nature Park became known.

Withdrawal of land plots from the Bolshoy Thach Nature Park

Earlier it was reported that on the public cadastral map, the Bolshoy Thach Nature Park lost two large land enclaves – the peaks of Bolshoy Thach and Maly Thach²⁰. It contradicts with the original boundaries of the natural park.²¹ Later, the Cabinet of Ministers of the Republic of Adygea adopted a new Regulation on the Nature Park with new boundaries.²² And in the 2023, the Head of the Republic of Adygea, by his decree, abolished the original boundaries of the Nature Park.²³ As a result, these territories were added to the register of available hunting territories in the Republic of Adygea.²⁴



Fig. 6: Destruction caused by the construction of a water pipeline. Photo: The authors

The abolished buffer zone of the Caucasus reserve in Adygea

Despite repeated references in the decisions of the Committee (2008, 2009, 2013) and Missions (2008, 2012) to the need to restore the legal status of the buffer zone of the reserve, this has not been done.

As a result, the construction of the first hotel village for the Lagonaki Ski Resort (“Upper Village”) began less than 1 km from the boundary of the reserve. The active construction of the Lagonaki – Guzeripl highway continues at a distance of 1 to 5 km along the boundaries of the reserve in the area of the Kamennoe More ridge. The construction is carried out with the mass

cutting of trees, and migration routes of animals are cut off. Also, commercial clear-cutting is allowed and carried out,²⁵ as well as numerous hunting farms are located in Adygea along the boundary of the reserve.²⁶

Notes

- 1 <http://government.ru/news/48168/>
- 2 <http://government.ru/news/48405/>
- 3 <https://t.me/matveevkomment/4669>
- 4 <https://www.kommersant.ru/doc/6379819>
- 5 <https://www.interfax.ru/russia/941238>
- 6 <https://whc.unesco.org/en/decisions/7309>, <https://whc.unesco.org/en/decisions/7826>
- 7 https://vk.com/wall-188137983_1436
- 8 <http://adygheya.ru/press-room/news/sozдание-infrastruktury-dlya-ekokurort-a-lagonaki-vedetsya-pri-podderzhke-pravitelstva-rf/>
- 9 <https://www.elec.ru/news/2023/07/28/rosseti-kuban-nachala-stroitelstvo-infrastruktury.html>
- 10 <http://adygheya.ru/upload/iblock/62c/%D0%B-F%D1%80%D0%B8%D0%BA%D0%B0%D0%B7%20177-%D0%94%D0%9F%D0%A2%D0%A3%20%D0%BE%D1%82%2026.12.2023%20%D1%81%20%D0%BF%D1%80%D0%B8%D0%BB%D0%BE%D0%B6%D0%B5%D0%BD%D0%B8%D0%B5%D0%BC.pdf>
- 11 <http://adygheya.ru/upload/iblock/407/%D0%B-F%D1%80%D0%B8%D0%BA%D0%B0%D0%B7%20%D0%BE%D1%82%2020.11.2023%20%E2%84%96%20162-%D0%94%D0%9F%D0%A2%D0%A3%20%D1%81%20%D0%B-F%D1%80%D0%B8%D0%BB%D0%BE%D0%B6%D0%B5%D0%BD%D0%B8%D0%B5%D0%BC.pdf>
- 12 <https://kuban.rbc.ru/krasnodar/freenews/6464b97d9a794765f79b7dc9>
- 13 <https://www.kommersant.ru/doc/6382338>
- 14 <https://ciaec.ru/investigations/tkachenaki-part-1-master-plan-of-resort/>
- 15 <https://westerncaucasus.org/lagonaki/>
- 16 <https://www.change.org/LagonakiZhivi>
- 17 <https://ciaec.ru/our-blog/lyzhnya-na-krasnoy-knige-lagonaki-resort/>
- 18 <http://www.adygheya.ru/ministers/departments/ministerstvo-ekonomicheskogo-razvitiya-i-torgovli/strategiche/razrabot/>
- 19 <https://pkk.rosreestr.ru/#/search/45.07106169285992,39.073712585043644/4/@bs7nhsaos?text=1%3A4%3A5901001%3A382&type=1&nameTab&indexTab&opened=1%3A4%3A5901001%3A382>
- 20 <https://pkk.rosreestr.ru/#/search/44.04377275774727,40.43089927139455/13/@5w3tqw5qm?text=01%3A04%3A5802001%3A74&type=1&opened=1%3A4%3A5802001%3A74>
- 21 <https://docs.cntd.ru/document/459702684>
- 22 <http://www.adygheya.ru/ministers/departments/upravlenie-po-okhrane-okruzhayushchey-sredy-i-prirodnym-resursam/otsenka-reguliruyushchego-vozdeystviya/ministrovkab.php>
- 23 <http://www.adygheya.ru/upload/iblock/573/150-%D1%83%20-.pdf>
- 24 <http://www.adygheya.ru/ministers/departments/upravlenie-po-okhrane-i-ispolzovaniyu-obektov-zhivotnogo-mira-i-vodnykh-biologicheskikh-resurov/informatsiya-dlya/karty.php>
- 25 <https://forestles.ru/map>
- 26 <https://huntmap.ru/karta-ohotnichih-ugodij-respubliki-adygeja>

Legal Obstacles to the Implementation of the World Heritage Convention in the Kazakhstan

Valeriy Krylov, Sergey Kuratov and Nataliya Medvedeva,
Ecological Society "Green Salvation"



Contradictions in legislation

There are still serious contradictions in the legislation of the Republic of Kazakhstan that impede the implementation of the World Heritage Convention. Legal innovations, changes and additions of the last two years not only did not eliminate them, but also further aggravated the situation.

With the adoption of the new Environmental Code in 2021, the procedure for assessing environmental impact (hereinafter: EIA) was weakened. According to the 2007 Environmental Code, it was "mandatory for any types of economic and other activities that may have a direct or indirect impact on the environment and public health" (article 36, paragraph 1). According to the Environmental Code of 2021, the mandatory EIA procedure is provided only for types of activities and facilities included in a special annex (article 65, paragraph 1). The strategic environmental assessment introduced by the Environmental Code 2021 has not improved the situation. According to paragraph 3 of article 52: "Documents aimed at the development of agriculture, forestry, fisheries, energy, industry (including exploration and mining), transport, waste management, water management, telecommunications, tourism, planning of development of urban and rural areas, use and protection of land are subject to mandatory strategic environmental assessment." World Heritage sites, regardless of their environmental, cultural and historical value for the world community and Kazakhstan, are not subject to EIA and strategic environmental assessment. This is contrary to the provisions of paragraph 1b of Appendix III of the Convention on Environmental Impact Assessment in a Transboundary Context.

Existing norms and changes made to the law "On Specially Protected Natural Areas" (hereinafter: the law on protected areas) have increased the threat of fragmentation of the ecological systems of nature reserves and national parks. Article 23 allows the transfer of lands of specially protected natural areas (reserves and national parks) into reserve lands,¹ regardless of whether they are included in the World Heritage List (hereinafter: the List) or in the Tentative List: Paragraph 6-5) on the powers of the president was added to Article 7 of the law. He was given the authority to approve "the transfer of part of the lands of specially protected natural areas of republican significance, located within the boundaries of cities of republican sig-

nificance, to a specially protected natural area of local significance." This paragraph contradicts the powers of the president as defined in the Constitution and the Constitutional Law "On the President of the Republic of Kazakhstan."



Fig. 1: Massive cutting of trees. Aksai Canyon, former territory of Ile-Alatau National Park (October 6, 2023).

Photo: Ravil Nassyrov



Fig. 2: Unfinished and abandoned building, Big Almaty Canyon, Ile-Alatau National Park (May 9, 2023).

Photo: Ravil Nassyrov

Article 46 of the law on protected areas regulates the procedure for leasing land plots of national parks for short-term and long-term lease (up to 25 years). Only areas of national parks in areas of tourist, recreational and limited economic activity can be leased, but it does not take into account whether national parks are included in the List or in the Tentative List! Zones of tourist, recreational and limited economic activity, for example, in the Ile-Alatau National Park, in 2023 accounted for

more than 60% of its area (7.8% and 53.0%, respectively).² It is obvious that its territory is subject to severe fragmentation and anthropogenic pressure. Tenants cause serious damage to the ecological systems of the Ile-Alatau National Park. This significantly reduces the likelihood of it being included on the World Heritage List (the park was included on the Tentative List in 2002).

A similar situation has developed in the “Altyn-Emel” National Park, which was included in the List in 2023.³ Zones of tourist, recreational and limited economic activity in 2020 occupied 59.9% (4.1% and 55.8%, respectively)⁴ of its territory.

A serious obstacle to the implementation of the Convention is the unsatisfactory compliance with legislation, primarily by government bodies, including local executive bodies and specially authorized bodies in the field of environmental protection.

Local executive bodies impede compliance with the Convention

On September 20, 2021, the Ecological Society “Green Salvation” (hereinafter: the Ecological Society) appealed to the Akimat of the city of Almaty (hereinafter: Akimat)⁵ with a request to take measures to establish a protective zone of the Ile-Alatau National Park. This is provided for by both national legislation and the standards of the World Heritage Convention for properties included in the Tentative List.

According to subparagraph 11 of paragraph 2 of article 10 of the law on protected areas: “Local executive bodies of regions, cities of republican significance, the capital... make decisions on the establishment of protective zones of specially protected natural areas of all types with restrictions within these zones of activities that negatively affect the state of the ecological systems of these territories... as well as the regime for their protection and use.” The law was adopted in 2006, but for 15 years the Akimat ignored its demand.

The Ecological Society asked the Akimat to report on what measures it plans to take to organize a protected zone of the park. The Akimat forwarded the letter to the Green Economy Department of Almaty. The Department sent it to the administration of the Ile-Alatau National Park. The Ecological Society did not receive a response. On October 28, the Ecological Society again appealed to the Akimat, pointing out violations of the public’s rights to access environmental information. The result was the same.

On December 6, 2021, the Ecological Society filed a statement of claim with the Specialized Interdistrict Administrative Court of Almaty. The Ecological Society demanded that the court recognize the inaction of the Akimat and oblige it to establish a protective zone. The consideration of the case continued until April 15, 2022. The prosecutor supported the request of the

Ecological Society. He emphasized that 15 years is more than enough time to solve the problem. The court ruled to satisfy the claim partially. The Akimat was recommended to “consider the issue of providing information.” The court unreasonably rejected the request to establish a protective zone.

On May 19, the Ecological Society filed an appeal with the Almaty City Court. On September 7, the court rejected the appeal. On October 12, 2022, the Ecological Society filed a cassation appeal to the Supreme Court. On May 31, 2023, the Supreme Court upheld the complaint in full, overturned all judicial acts of lower courts, and ordered the Akimat to establish a protective zone of the national park. The decision of the Supreme Court will not be implemented until the end of 2023. The Environmental Society again went to court to enforce the decision.

In 2023, the Akimat of Almaty was developing a rationale for transferring part of the lands of the Ile-Alatau National Park to the lands of protected areas of local importance. The Akimat justified its actions by the fact that these lands fall within the administrative boundaries of the city, and it is necessary to build engineering infrastructure for tourism facilities. The dismemberment of the national park by transferring part of its territory to protected areas of local significance reduces the likelihood of its inclusion in the List.



Fig. 3: Mudflow protection dam, Big Almaty Canyon, former territory of Ile-Alatau National Park (May 9, 2023).

Photo: Ravil Nassyrov



Fig. 4: New construction on the riverbank, Kimasar Canyon, Ile-Alatau National Park (May 2, 2023).

Photo: Ravil Nassyrov

On July 5, 2023, the Ecological Society sent appeals to the President, Prime Minister, and Minister of Ecology and Natural Resources demanding that the destruction of the national park be prevented. In response, on July 26, 2023, the Ministry of Ecology and Natural Resources reported that materials on the transfer of the lands of the Ile-Alatau National Park to the lands of the regional park had not been received.

By the end of 2023, the controversy subsided, but the Akimat did not abandon its idea.

World Heritage and the Asian Development Bank (ADB)

In 2022, the media began discussing a new plan for the construction of a ski resort on the territory of the Ile-Alatau National Park. To clarify the situation, the Ecological Society sent several requests to the Tourism Industry Committee of the Ministry of Culture and Sports, the Forestry and Wildlife Committee of the Ministry of Ecology and Natural Resources and the Ministry of Foreign Affairs. The Tourism Industry Committee reported that “work is currently underway to develop a draft strategy for the development of the Turgen mountain resort complex with the involvement of technical assistance from the Asian Development Bank.”⁶ However, the decision has not been made yet.

The Ministry of Foreign Affairs reported that “according to the results of the latest revision of the Tentative List from the Republic of Kazakhstan, the Ile-Alatau National Park remained on this list under the name “Northern Tien Shan.” The Almaty State Nature Reserve was also included in this nomination. ... This entry on the Tentative List is intended to be an extension of the “Xinjiang Tianshan site,” already inscribed on the World Heritage List in 2013 by China.”⁷ In 2023, the Ministry reported that in October 2022, ADB prepared “a draft pre-feasibility study that reflects the initial environmental assessment and the results of public consultations. At present, a decision on the implementation of the project has not yet been made.”⁸

The Committee of Forestry and Wildlife responded that the Turgen ski resort is supposed to be built “on the territory of the Turgen branch of the Ile-Alatau National Park on an area of about 6,100 hectares, including more than 2,150 hectares located in the environmental stabilization zone, more than 1,150 hectares in the conservation regime zone and more than 2,800 hectares in a zone of limited economic activity. ...In this regard, the implementation of the Project is not possible. In addition, no proposals were received by the Committee.”⁹ It is obvious that the new resort complex project is being developed without the approval of the Committee. In 2023, the Forestry and Wildlife Committee confirmed its position.

The “Master Plan for Tourism of the Almaty-Bishkek Economic Corridor,” published by ADB in 2019, states that it is planned to

“develop the Turgen ski resort,” although the bank’s specialists are well aware that the project is planned to be implemented on the territory of the Ile-Alatau National Park, included in the Tentative List. Until the end of 2023, a decision on construction was not made.¹⁰

Conclusion

Despite the fact that in 2023 the number of sites on the territory of Kazakhstan included in the World Heritage List has increased, the integrity of their ecological systems is not guaranteed by law.

The ecological society “Green Salvation” believes that it is necessary:

- ensure strict compliance with international conventions and national legislation in the field of specially protected natural areas;
- prohibit the transfer of any areas of protected areas of republican significance to the category of reserve lands and specially protected natural areas of local significance;
- prohibit the interference of local executive bodies in the main activities of protected areas of republican significance;
- accelerate the inclusion of Ile-Alatau National Park on the World Heritage List.

Notes

- 1 “Reserve lands are all lands that are not granted ownership or land use and are under the jurisdiction of local executive bodies.” Land Code of the Republic of Kazakhstan dated June 20, 2003 (with amendments and additions as of January 1, 2024), paragraph 1 article 137.
- 2 Adjustment of the feasibility study of the Ile-Alatau State National Natural Park, project planning in terms of the master plan for infrastructure development.—Almaty, 2023, p.9.
- 3 Cold Winter Deserts of Turan: <https://whc.unesco.org/en/list/1693>.
- 4 Adjustment of the feasibility study of the state national natural park “Altyn-Emel” in terms of the master plan for the development of ecotourism infrastructure. – Almaty, 2020, p.18.
- 5 Akimat is a local executive body.
- 6 Response of the Tourism Industry Committee (date and number not specified) to the letter of the Ecological Society “Green Salvation” dated May 20, 2023 (Ref. No. 042).
- 7 Response of the Ministry of Foreign Affairs dated May 25, 2022 (Ref. No. 1-18/ZT-K-141 dated May 23, 2022) to the letter of the Ecological Society “Green Salvation” dated May 16, 2022 (Ref. No. 038).
- 8 Response of the Ministry of Foreign Affairs dated May 5, 2023 (Ref. No. 1-18/ZT-K-45) to the letter of the Ecological Society “Green Salvation” dated April 25, 2023 (Ref. No. 027).
- 9 Response of the Forestry and Wildlife Committee dated June 9, 2022 (Ref. No. 27-2-20/3T-2022-01759830) to the letter of the Ecological Society “Green Salvation” dated May 20, 2022 (Ref. No. 043).
- 10 Master plan for tourism of the Almaty-Bishkek economic corridor. 2019, Asian Development Bank, p.34: <https://www.adb.org/sites/default/files/publication/560606/abec-tourism-master-plan-ru.pdf>.

Imminent threats to the Western Tien Shan in Kyrgyzstan, Uzbekistan and Kazakhstan

Rivers Without Boundaries



The Western Tien Shan has been inscribed in 2016 based on criterion (x) as it supports outstanding diversity of plant and animal species with a high level of endemism and many species of global conservation importance, including several wild relatives of commercial fruit trees such as wild apricot, apple, walnut, etc. The highest biodiversity is found in mountain river valleys. The property consists of almost 20 sites and is jointly managed by Kyrgyzstan, Uzbekistan, and Kazakhstan. In 2023 we have observed grave threats to the World Heritage property in all three countries.

Kyrgyzstan: gold mining, road-building, and hydro

In 2023, the Government of the Kyrgyz Republic has grossly violated its obligations on the conservation of the sites of the World Heritage property "Western Tien Shan" (#1490) three times, and that threatens with degradation the natural ecosystems of two parts of the property on the territory of Kyrgyzstan. Now the government prepares for the 4th most serious violation – excising lands out of the Besh-Aral Strict Nature Reserve in order to build hydropower plants there.

1. Removing protection from the World Heritage

Government Resolution No. 359 dated July 12, 2023 "On the transfer of lands in the north-east of the site "Sandalash" with a total area of 19,396 hectares from the category of 'Lands of specially protected natural territories' to the category of 'Reserve lands'¹". Those lands belong to the remote part of the Besh-Aral nature reserve and the World Heritage Site "Western Tian-Shan". The decree effectively eliminates the entire Sandalash Reserve, an area of 25,800 hectares, leaving this component of the World Heritage property without protection.

The main interested party is the Chaarat Zaav company², which has obtained licenses for exploration and is building roads and infrastructure on and around the World Heritage site. Easily accessible reserves of gold ore in this area are up to 25 tons, and less-accessible up to 85 tons. The ultimate owner of "Chaarat Zaav" is "Chaarat Gold Holdings Ltd", a London-listed company. In an investor presentation (November 2023), the com-

pany reports that the "Besh Aral (reserve) issue has been finally resolved" and a contract has been signed with Power China Corporation for mining and infrastructure completion³.



Fig. 1: The new road to the Chaarat mine apparently passes through the Sandalash site of the World Heritage property, where the protected area status has been abolished.

Photo: www.chaarat.kg

2. Road Construction

By Government Decree No. 124 dated March 3, 2023, 200 hectares were withdrawn from the Besh-Aral Nature Reserve for the construction (slyly called "renovation") of a road crossing the entire reserve from Ak -Tash village to the border with Uzbekistan⁴. In fact the road has been illegally "renovated" since 2018, including in the interests of the mining company MURAS SYNTHES LLC⁵. The road is also used to support surveys for the creation of large hydropower plants and placer gold prospecting.

3. Placer Gold Prospecting

By Order No. 290-r dated May 30, 2023, the Cabinet of Ministers of the Kyrgyz Republic granted the State Enterprise "Kyrgyzgeologiya" the right of geological exploration in the area of placer gold deposits at Naiza-Tugai and Arab⁶ located inside the Besh Aral Reserve in the Chatkal River valley. Issuing licenses for gold exploration and mining within the reserve is a violation of both the country's laws and the World Heritage Convention.

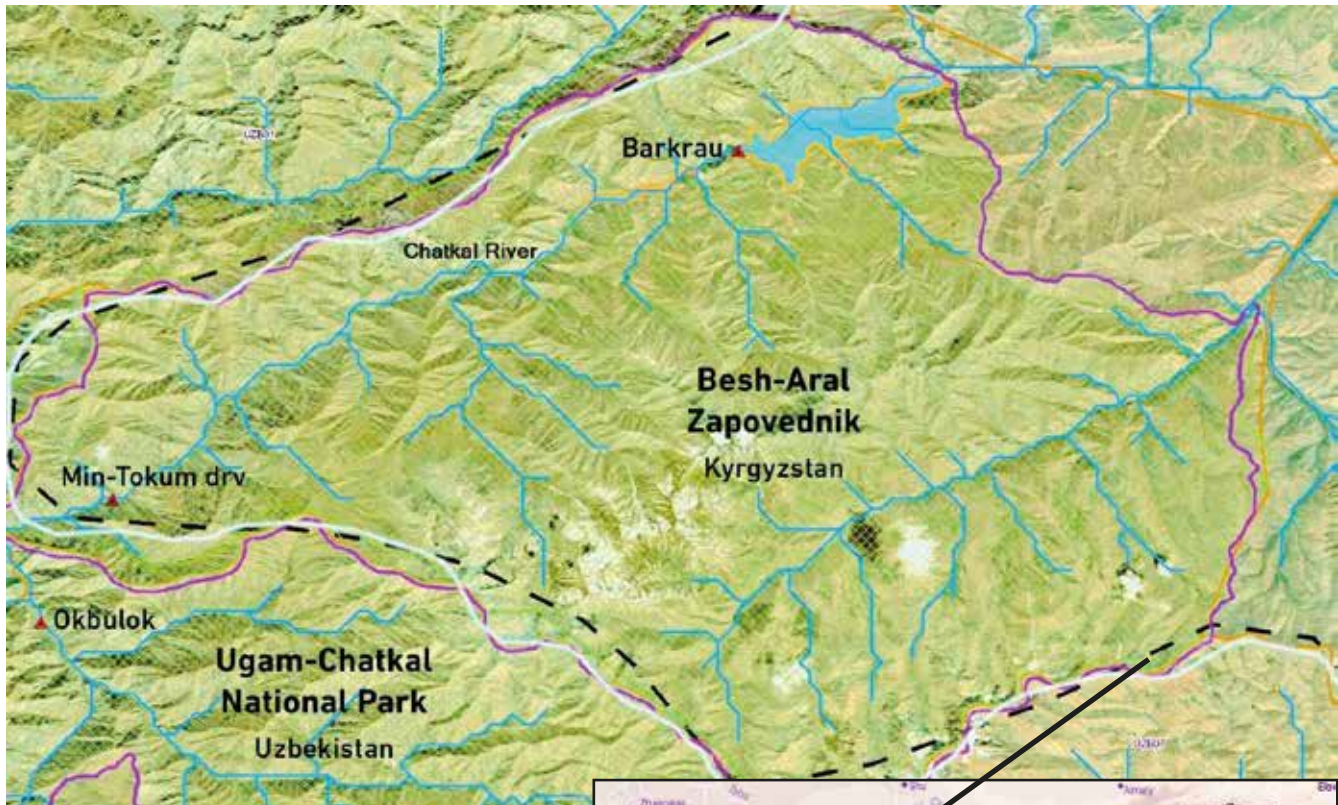


Fig. 2: Lands to be excluded from the Besh Aral Nature reserve for HPP development (2023)
Map: Rivers without Boundaries GIS



4. A hydropower cascade planned inside the Besh-Aral Reserve

The Government of Kyrgyzstan is considering the construction of 2 Hydro-electric Power Plants with a total installed capacity of 1,050 MW: “Barkrau” – 350 MW; and “Min-Tukum” - 700 MW, with an average annual output of 2.0 billion kWh. The river valley will be flooded by two reservoirs for about 15 kilometers, and further downstream 25 kilometres will be dewatered and degraded by derivation pipes.

On December 12, 2023, the vice-minister for energy of the Kyrgyz Republic, Ms. N. Zh. Usenova, sent to various agencies “for consultation” a draft Decree “On the exclusion of lands from the Besh-Aral State Nature Reserve for the construction of hydropower on Chatkal River” which orders the exclusion of 1,250 hectares from the Besh-Aral State Nature Reserve, while adding to it 20,846 hectares in a completely new location east of the headwaters of the Chatkal River. The new high-mountain area proposed as compensation has a very monotonous ecosystem cover and does not include any known biodiversity values. After protests from scientists and NGOs the Government suggested to discuss another design with only one dam and reservoir, but, likely, it will be associated with the same degree of destructive impacts on the World Heritage property.

Biodiversity values which may be lost

Although only about 1% of the Besh-Aral Strict Nature Reserve territory will be flooded, the destruction of the central river will have a devastating effect on its entire natural ecosystem. Fragmentation of the Chatkal River and its dewatering by derivation, as well as the creation of reservoirs will fully degrade its aquatic ecosystems and their biota, including narrow-range endemic fish, such as the Chatkal sculpin *Cottus jaxartensis*. The staff of the Institute of Biology of the Kyrgyz Republic during their October 2023 field survey of Besh Aral observed many rare fauna species: golden eagle *Aquila chrysaetos*, black vulture *Aegypius monachus*, white-headed vulture *Gyps fulvus*, kumai *Gyps himalayensis*, warhog *Gypaetus barbatus*, white-winged woodpecker *Dendrocopus leucopterus*, lynx *Lynx lynx*, and brown bear *Ursus arctos*.

Most of the rare and endangered vertebrate species in the Reserve inhabit the area of the planned HPP and reservoir, or

use it as a foraging area. These constructions will also destroy the floodplain complex, which is the only remaining area of low-land floodplain forests in the area. Construction of overhead power lines on the territory of the reserve will undoubtedly lead to collision of birds of prey with wires. The Chatkal River floodplain hosts many rare plants including local endemics and wild pre-cursors of domesticated fruit trees. The scientists concluded that in case of degradation of the Chatkal River floodplain valley, which is the "core axis" of the Reserve, the integrity of the World Heritage site will be ruined and this will pave the way for other destructive activities.⁷



Fig. 3: Floodplain Forest of the Chatkal River. Photo: Institute of Biology of the National Academy of Sciences of the Kyrgyz Republic



Fig. 4: Chatkal River Valley forest of the Besh-Aral State Nature Reserve near Mount Chep-Tash. Photo: Institute of Biology of the National Academy of Sciences of the Kyrgyz Republic

Dangerous enabling activities

The Cabinet of Ministers of Kyrgyzstan in 2023 adopted a special decree on "emergency in energy sector in 2023-2026"⁸ which allows to bypass many national laws and regulations, when allotting land for power plants and other facilities. For example, such land transfers are exempt from public consultations and rigorous ESIA's. At the same time more than 30 large hydro-power project are being actively considered by the government, which may allow to prioritise dams that do not have conflict with global biodiversity values.

On November 10, 2023, Kyrgyz President Sadyr Zhaparov, within the framework of a working visit to Paris, met with the Chairman of the Board of Directors and CEO of Électricité de France (EDF), Mr. Luke Remont, and urged him to participate in the creation of a cascade of hydropower plants on the Chatkal River⁹.

Uzbekistan ready to cooperate and adding dams in between

According to the media, on January 27, 2023, the Ministries of Energy of Kyrgyzstan and Uzbekistan signed a "Memorandum on joint study of opportunities to for construction of the Chatkal cascade of HPPs"¹⁰. In 2022 an engineering company JSC „Gidroproject“ based in Tashkent, Uzbekistan updated the Soviet hydropower scheme for the Chatkal River.

Uzbekistan itself is actively building 5 HPPs and preparing to start construction of 6 more dams in the Ugam-Chatkal National Park. All of those are not inside but in-between World Heritage areas. Examples include:

1. Lower Chatkal Hydro on the Chatkal River built immediately downstream of the Besh Aral Nature Reserve in Kyrgyzstan and possibly drowning a part of the World Heritage property.
2. Akbulak Hydro planned downstream from the Maidantal site of the World Heritage property, blocking its river basin.
3. Ugam cascade of 3 small hydro planned downstream of Kazakhstan's Sairam-Ugam National Park, on the Ugam River. Potential impacts of all these dams should be subject to world heritage assessments.

Kazakhstan hydropower cascade under disguise of water supply

A project proposed in 2021 by a subsidiary of South Oil Co¹¹ envisions the development of a cascade of up to 7 hydropower dams on the Ugam River and a 210 km water-supply pipeline to populated areas. Total hydropower capacity will be 72-165 MW, and the water supply 3,5 cubic meters per second. This project needs to use for construction 850,9 ha of lands in the middle of Sairam-Ugam National Park, one of the most diverse and well-preserved parts of the West Tien Shan property in Kazakhstan. In 2022 a subsidiary of South Oil Co. contracted the "Terra-GIS" Company to design adjustments to National Park zoning in order to remove legal obstacles for hydropower construction. South Oil insists that in May 2023 it secured an EPC contract for construction with «Power China» Co, which may be backed by loans from Chinese policy banks.

In case this project is implemented, the central element of the national park ecosystem – the Ugam River and its valley - will be fully degraded by hydropower and water withdrawal structures. Planned water supply will reduce the flow in downstream



Fig. 5: Chatkal river upstream of the Lower Chatkal Hydro construction site in Uzbekistan (August 2023).
Photo: Rivers without Boundaries

stretches of the river. At the moment, the project proponents agreed to undertake a Heritage Impact Assessment, but whether it will be done independently and with proper quality is highly uncertain.

Upcoming Reactive Monitoring Mission

A UNESCO/IUCN mission was invited to the Western Tien Shan in 2024. Whether or not this World Heritage property will be degraded by on-going and planned activities described above depends very much on the ability of this upcoming Mission to explore all problems and take the right decisions. In our under-



Fig. 6: Ugam River Canyon

Photo: Ugam LLC

standing, unless the authorities promptly revise those development plans, the World Heritage property must be inscribed on the List of World Heritage in Danger, and a corresponding remediation program should be enacted.

Notes

- 1 <http://cbd.minjust.gov.kg/act/view/ru-ru/160321>
- 2 <https://www.chaarat.com/kyrgyzstan>
- 3 <https://www.chaarat.com/wp-content/uploads/2023/11/Chaarat-Investor-Presentation-Nov-2023.pdf>
- 4 <http://cbd.minjust.gov.kg/act/view/ru-ru/160089>
- 5 <https://statsnet.co/companies/kg/56772945>
- 6 <http://cbd.minjust.gov.kg/act/view/ru-ru/219607>
- 7 Source: Institute of Biology of the National Academy of Sciences of the Kyrgyz Republic (Facebook) [https://www.facebook.com/profile.php?id=100083157551213&__cft__\[0\]=AZUV5gCt75zN3p5QDP4abHE_MFysY4SY23Xy0ySZcqMynfDY0JhBzFrKrnf0A-Emi8rCJzy4Q9CcgoJSh-h_jupZX-rXPK26R6rkDf91PZ_xk3tW_gJcllaW4YEtvquj8PQ5_sgsyFMWzwqsPxxg0Kvc-CJMup_ikPjXEtroUEY9RRiRzqjF8_TqJ9X1jiUSutT9E&__tn__=UC%2CP-R](https://www.facebook.com/profile.php?id=100083157551213&__cft__[0]=AZUV5gCt75zN3p5QDP4abHE_MFysY4SY23Xy0ySZcqMynfDY0JhBzFrKrnf0A-Emi8rCJzy4Q9CcgoJSh-h_jupZX-rXPK26R6rkDf91PZ_xk3tW_gJcllaW4YEtvquj8PQ5_sgsyFMWzwqsPxxg0Kvc-CJMup_ikPjXEtroUEY9RRiRzqjF8_TqJ9X1jiUSutT9E&__tn__=UC%2CP-R)
- 8 <https://thediplomat.com/2023/08/kyrgyzstan-declares-an-energy-emergency-and-looks-to-china-for-support/>
- 9 <https://rivers.help/n/1948>
- 10 <http://www.tazabek.kg/news:1856519/?from=tazabek&place=search&sth=2231e18dd8f631192f444e9f18477c43>
- 11 <https://south-oil.com/en/projects/construction-of-a-water-pipeline-with-chain-of-power-plants-on-the-ugam-river/>

Rogun Hydropower Project Threatens Tigrovaya Balka in Tajikistan

Eugene Simonov, Rivers without Boundaries Coalition

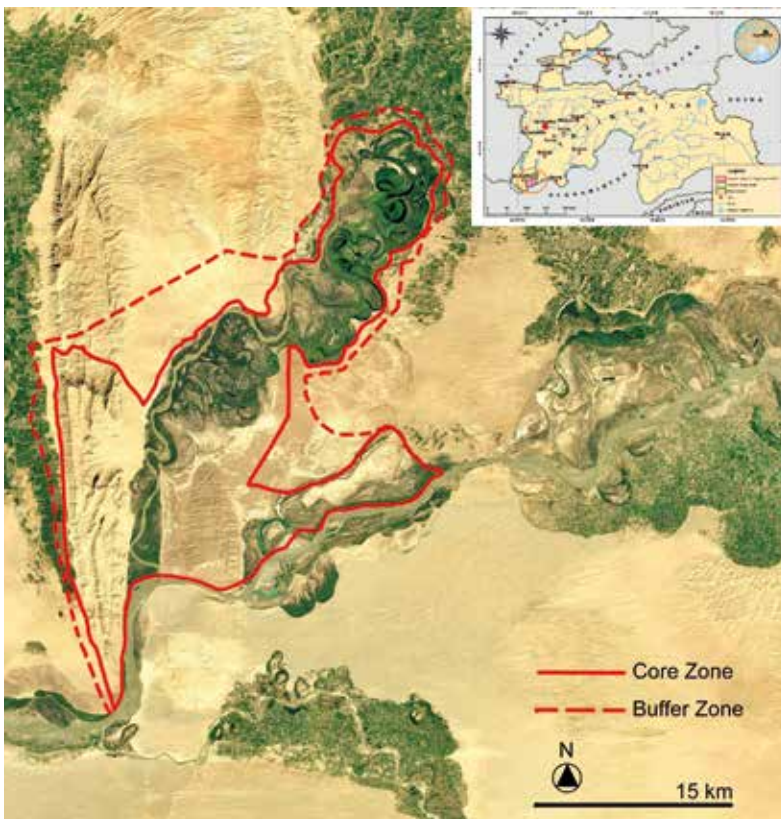


Fig. 1: The Tigrovaya Balka Nature Reserve and its location in Tajikistan. Map: NASA / Sayali Athale

The Rogun HPP Project in Tajikistan and the re-operation of the whole Vakhsh Hydropower Cascade may have impacts on the *tugay* forests of the Tigrovaya Balka Nature Reserve UNESCO World Heritage¹ property, due to the addition of the largest dam. The project² is presently considered for financing by the World Bank, the Asian Infrastructure Investment Bank, the European Investment Bank, the Asian Development Bank, the Islamic Development Bank, and other finance institutions. The Project's ESIA³ fully ignores potential dam impacts on the *tugay* forests of the Tigrovaya Balka Nature Reserve.

Critical Habitats and Species downstream of the Vakhsh Hydropower Cascade

The Tigrovaya Balka Nature Reserve is located between the Vakhsh and Panj rivers in southwestern Tajikistan. It includes extensive riparian *tugay* ecosystems, which represent the largest

and most intact *tugay* forest of this type in Central Asia, and this is the only place in the world where the Asiatic poplar *tugay* ecosystem has been preserved in its original state over an area of this size.

The ecosystems of the Tigrovaya Balka floodplain mainly depend on the meandering Vakhsh river and its fluvial dynamics which are conditioned by the variation in river flow, by regular seasonal variations (low flows in winter, high flows in summer) as well as by extraordinary flood events (extreme floods) and corresponding sediment flow. The water and sedimentation regime further determines habitat formation, groundwater levels, the chemistry of surface waters and aquifers, the composition and genesis of soils, changes in vegetation cover and the well-being of endangered fauna from many aquatic organisms to Bactrian Deer.

Historic impacts and attempts to mitigate them

For several decades the World Heritage property has faced the following many challenges:

- River flow changed by dams of the Vakhsh Cascade (Nurek Hydro built in the 1960s being the most impactful factor) reducing floods that sustain floodplain ecosystems. Floods shaped morphology, water regime, vegetation density and chemistry of floodplain habitats.
- Agricultural encroachment and pollution (floodplain lakes are partly fed by irrigation systems rich in salts, pesticides). Competition for water with irrigated agriculture located upstream of the reserve⁴.
- Poaching, illegal logging and grazing (as floodplains become dryer, they are more accessible)
- Decrease in groundwater levels due to change of river morphology because of the reservoirs upstream blocking sediment flow (deepening of channels in absence of sediment load), absence of replenishment from flood water inflows and decrease in silt deposition shaping relief and delivering nutrients in *tugay* forests.

- Vakhsh hydropower cascade decreased turbidity/sediment transport by 7–11 times, which radically altered riverbed and conditions for spawning and migration of shovelnose sturgeons.⁵



Fig. 2: Tugay forest on a high floodplain site. Photo: Alexei Butorin / UNESCO

The Rogun HPP Project promise and failure to fulfill it



Fig. 3: The location of the Rogun dam on the Vakhsh river, upstream from the Tigrovaya Balka Nature Reserve. Map: Zhao Xu et al. 2020⁹

Measures have been proposed to save the *tugay* ecosystem, and some of those were implemented. In 1976 the Government of the Tajik Soviet Republic prescribed measures to safeguard the Tigrovaya Balka, which included the implementation of “artificial floods”. In 2009 Dr. Petr Gunin, reviewing necessary measures, insisted on releasing “one large flood in 10-15 years, when the hydrological situation is favorable. In 2020 a GIZ Project formulated key conditions of ecosystem preservation: “By 2035, within the reserve at least 76% of the area within 500 m of the river is forested, with at least one sapling of *Populus pruinosa* per one m², and the forest experiences 25 or more days of flooding per year”⁶ In 2023 Tajik and international experts again emphasized that sustaining a favorable flooding regime in Vakhsh River is the most critical condition for preserving the Tigrovaya Balka⁷.

The World Heritage Committee Position

In 2023 World Heritage Committee inscribed the Tigrovaya Balka on the World Heritage List⁸ and provided guidance for its management and preservation: “The integrity of the property depends on the riparian dynamics of the Vakhsh and Panj rivers, with the Vakhsh being the most important but also the most modified by dams. Maintenance of the Outstanding Universal Value is contingent on regular supply of water from upstream sources....”

The World Heritage Committee Requests the State Party to:

1. Secure and maintain a natural hydrological regime for the property with sufficient provision of water to the property to maintain its Outstanding Universal Value,
2. Assess regularly the management effectiveness of the property, including research on the hydrological regime of the Vakhsh River in relation to the property,...

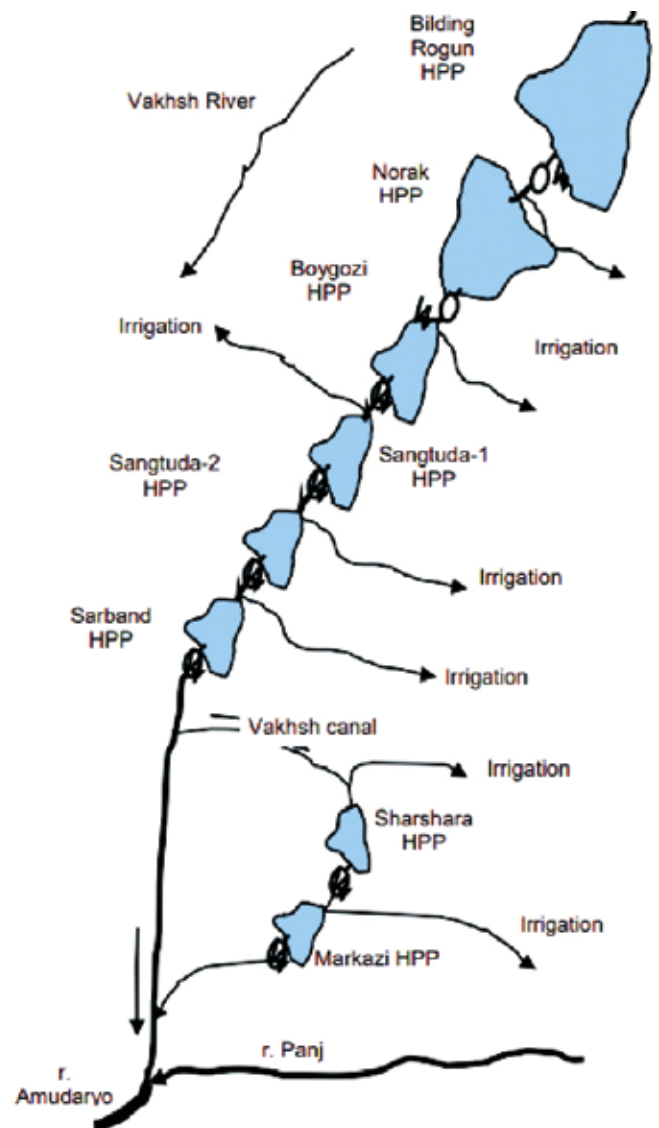


Fig. 4: The cascade of operating and planned hydro-electric power plants from the Rogun Dam downstream to the Tigrovaya Balka Nature Reserve. Diagram: Shokhin Dzhuraev et al. 2022¹⁰

The Rogun HPP, if built, will have a reservoir with an active capacity of 10 km³ or much more than 50% of the Vakhsh River's annual discharge. The rest of the Vakhsh cascade already has a total live volume of 4–6 km³. During filling of the enormous reservoir, which will take at least 15 years, it will compete for water with the growing Tajik agricultural irrigation needs, taking annually one km³ of water from the Vakhsh River. The whole cascade will be reoperated to incorporate the new dam, so that the Rogun Reservoir will from the day of completion redistribute summer flows to winter months, cutting peaks of large floods, while the Nurek reservoir will be managed as a run-of-river dam.

The way the Rogun HPP operates will either further degrade floodplain forests and wetlands, or by setting a special environmental flow regime and other measures this damage may be partially mitigated.

This need was mentioned in the 2014 Rogun HPP ESIA¹¹, which suggested that the project "Release of occasional "artificial floods"; ... *First step: initial study in Tigrovaya Balka study would include assessment of feasibility of staged floods to mimic previous natural flows. If not practical, identify alternative measures to improve situation*". We are not aware of any such study being carried out under the World Bank supervision after 2014 ESIA was shelved.

Nevertheless, the 2022 Terms of Reference for the "Update Environmental and Social Instruments for the Rogun HPP Project" **point (i)** states that the preparation of the Biodiversity Management Plan "will include working with Rogun and Tigrovaya Balka experts to **assess the feasibility of having Rogun release water in a pattern and amount that at least partially mimics previously naturally occurring floods, which ended with the construction of Nurek HPP**¹²". However, even this promise for a feasibility study, which only partially covers objectives of the ESIA, has not been fulfilled, as the 2023 ESIA materials do not contain the results of such an assessment on the feasibility of environmental flow releases. The Biodiversity Management Plan that could incorporate implementation of "artificial floods" and other specific measures has not been disclosed.

At the same time, the 2023 ESIA text on page 106 of Volume I recognizes the potential (and even desirability) of the Rogun HPP's decisive impact on flood regulation downstream of the Vakhsh HPP Cascade: "4.11.8. *The construction of the Project will improve flood routing capacity for the area downstream of the Vakhsh cascade. This positive effect could be increased by appropriate flood management. The inclusion of Rogun HPP in the cascade would also reduce risks of floods of lower magnitude, but with a higher probability of occurrence.*" It was flood control by the Nurek HPP that previously led to the deterioration of the Tigrovaya Balka ecosystems, and now it will be further exacerbated by the creation of the Rogun reservoir. It is very clear that even continuation of the "current operation pat-

tern of flow regulation by a hydropower cascade" proposed in the ESIA as the only possible option will have a negative impact on the World Heritage Site.

In order to justify this regime, the ESIA must include a study of these impacts on the OUV of the World Natural Heritage property, as well as a study of impacts under other alternative operation pattern regimes. An environmental flow regime sufficient for safeguarding and recovery of the Tigrovaya Balka ecosystems should be designed as a part of those assessment studies for incorporation into any operational regime proposed. The impact assessment should have been carried in line with the 2022 Guidance and Toolkit on Impact Assessments in a World Heritage Context¹³ – "to ensure that direct, indirect and cumulative impacts on OUV have been properly reviewed and considered in consultation with relevant stakeholders and rights-holders, to inform decision-making. The loss or damage to OUV cannot be compensated for, as OUV is irreplaceable, and thus all damage must be avoided. The concept of 'offset' therefore is not applicable in the context of World Heritage".



Fig. 5: With 335m, the Rogun Dam will be the highest ever built in the world.

Photo: Francesco Celeste

The following steps must be urgently taken within a framework of the Rogun HPP Project and its ESIA process before any multilateral finance institutions make decision to proceed with the project support:

1. The Rogun HPP project's area of impact (AOI) considered in the ESIA should be extended to the Tigrovaya Balka Nature Reserve and further to the Amu Darya Delta in order to assess multiple flow regimes resulting from various possible modes of the Rogun reservoir operation in the context of the whole Vakhsh Hydropower Cascade management as well as the full spectrum of impacts on the freshwater biodiversity, wildlife populations, ecosystem processes (services) of the river, river-related socio-economic activities (e.g. irrigation), and others.
2. Comprehensive assessment of the baseline situation, as well as direct and indirect potential impacts of Rogun HPP project and its cumulative impacts on the World Heritage prop-

erty must be carried out for those areas and presented to IUCN/UNESCO for review.

3. Environmental flow regime with flood releases sufficient for safeguarding and recovery of the Tigrovaya Balka ecosystems should be designed as a part of those assessment studies. Climate change projections should be considered. Endangered fish species needs should be studied and considered. Potential impacts on other remaining Tugay (flood-plain forest) ecosystems in the nature reserves of Turkmenistan and Uzbekistan should also be assessed within the revised ESIA.
4. Potential water allocation conflicts between hydropower and irrigated agriculture and their possible impacts on quantity and quality of water supply to Tigrovaya Balka should be studied in the context of climate change with special attention to reservoir filling period. Cumulative Impact Assessment (CIA) with other hydropower projects in the Vakhsh and broader Amu Darya basin must be carried out. The upgrades in the CIA should pay specific attention to impacts on globally important biodiversity.
5. Binding the Biodiversity Management Plan with comprehensive measures must be designed with all key commitments reflected in the Environmental and Social Commitment Plan (ESCP) and other relevant legal agreements before any decision of financing. Those agreements, amongst other things, must guarantee that enforceable reservoir regulation rules for Rogun Reservoir and Vakhsh Cascade include appropriate environmental flow releases and consider all other necessary safeguards identified through heritage impact assessments and the rest of the renewed ESIA.

Four CSOs urged the IUCN and UNESCO to intervene promptly to ensure that the Tigrovaya Balka World Heritage property is preserved in the course of finalization of hydroengineering plans in Tajikistan, and long-term water inflow is enhanced by ensuring a proper regime of environmental flows.

Notes

- 1 <https://whc.unesco.org/en/list/1685/>
- 2 <https://projects.worldbank.org/en/projects-operations/project-detail/P181029>
- 3 <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/099122223091529585/p1810291b43c970a71993e1a8e76ceb151c>
- 4 <https://www.mdpi.com/2225-1154/10/2/13>
- 5 <https://www.cms.int/en/document/shovelfish-or-large-amu-dar-shovelnose-pseudoscaphirhynchus-kaufmanni>
- 6 https://conservationstandards.org/wp-content/uploads/sites/3/2021/01/210119_CSCP_Publication_Web.pdf
- 7 <https://cabar.asia/en/tigrovaya-balka-nature-reserve-in-tajikistan-how-can-we-save-the-last-stronghold-of-tugay-forests-2>
- 8 <https://whc.unesco.org/en/decisions/8411>
- 9 Zhao Xu et al. (2020): The Integrated Hydropower Sustainability Assessment in Tajikistan: A Case Study of Rogun Hydropower Plant. In: *Advances in Civil Engineering Volume 2020*, Article ID 8894072
- 10 Shokhin Dzuraev et al. (2022): Specifics of hydropower plant management in isolated power systems. In: *PRZEGLĄD ELEKTROTECHNICZNY 1(4):55-59*
- 11 https://www.worldbank.org/content/dam/Worldbank/Event/ECA/central-asia/11_ESIA_Environmental%20and%20Social%20Impacts_Version_ENG.pdf
- 12 <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/0993335005162258056/p17881905baf660009df70fe368c67810c>
- 13 <https://whc.unesco.org/en/guidance-toolkit-impact-assessments/>

Chronic Mismanagement and Weakened Protection of Lake Baikal

Eugene Simonov, Rivers without Boundaries



Fig. 1: Coastal Erosion at Oimur Meadow in Buryatia Republic (2021).

Photo: Rivers without Boundaries

The State Party reports issued over the last 5 years became thicker and thicker, reaching 70 pages in 2024. The latest report¹ attempts to provide some information on each question asked by the World Heritage Committee at its 2023 session. However much of this information is not very relevant to the conservation of Lake Baikal's OUV, and answers to the most important questions are lacking. The 2024 Report recognizes some negative trends, like rapid continuous decrease in numbers of the Omul Whitelfish (*Coregonus migratorius*) – the main commercially caught species, but “forgets” to mention much more endangered fishes, such as the Baikal Sig (*Coregonus lavaretus*) and Baikal Sturgeon (*Acipenser baerii*), as well as about 1,500 species of endemic invertebrates which are central to Lake Baikal's biodiversity.

Water Level Regulation

According to the report in December 2023, the government received the results of a three-year long “*Study on the environmental impact of changes in the water level in Lake Baikal in the regulation range from 455.54 m to 457.85 m on the state of the Lake Baikal ecosystem, as well as to deter-*

mine the possible damage to economic facilities and infrastructure of the coastal territories”. The study was commissioned mainly in response to the repeated requests from the World Heritage Committee “to refrain from renewing legislative amendments which allow extending the water level variation beyond one metre due to potential negative impact on the property and its Outstanding Universal Value (OUV), until the impacts of all existing water use and management regulations on the OUV are fully assessed and the requirements for its protection are set.”²

The report does not present substantive conclusions from the “study” or new data but shows illegally introduced manipulations by Russian agencies in the new water regulation regime. In violation of the requirements set forth by the World Heritage Committee, the Irkutsk Reservoir is now managed with routine violations of the upper water level limit of 457 meters asl: in 2020 it was above an unsafe level for 54 days, in 2021 for 109 days, in 2023 for 92 days. In December 2021, Rwb presented exhaustive evidence of immense damage to the Lake's

1 <https://whc.unesco.org/document/205395>

2 The last of at least 5 such decisions issued in 2023 <https://whc.unesco.org/en/decisions/8298>

OUV when the level reached 457.30m while the new regulations aim to allow raising it to 457.50 or even 457.85 meters.³

Now the Russian Government claims that the new water level regulation has been justified by this “study” which cannot be subjected to an ESIA/Heritage Impact Assessment according to Russian law. The Report neither suggests how to resolve this awkward situation, nor does it promise that UNESCO will get the report from 3-year research concluded in 2023. This is obviously a trickery that contradicts the original purposes of this “study” as well as international obligations of the State Party. In our view, such a study may still constitute an (incomplete) impact assessment, which was the document originally requested by the WH Committee, and the World Heritage Center and IUCN have the right and obligation to review the results of the “study” in lieu of a proper heritage impact assessment. The main problem, however, is that the terms of reference for this study poorly define the potential impacts on the OUV of the property. As a result, the study has missed important aspects of the value of shoreline landscapes affected by erosion and flooding, impacts on rare and endemic invertebrates which constitute the bulk of the lake’s biodiversity, impacts on aquatic plants and algae, etc.

Recommendations resulting from the “study” may deny the most crucial need in the water level management: necessity to remove obstacles in low-lying areas downstream from Irkutsk Dam, which prevent it from being properly used for flood routing in high-water periods. In recent years and months, decisions on the water released below the dam were driven by intention to safeguard illegally built summerhouses along the Angara river. Unless those properties are relocated from land used for periodic flood routing, there is little hope to safeguard Lake Baikal from degradation due to high water levels.

“Legislation” Annexes

Since 2021 there have been at least three attempts to radically weaken “Law on Protection of Lake Baikal”. The State Party Report includes an Annex II with a table showing amendments to the law passed in 2023 at the first hearing in the Parliament. All these amendments weaken the protection of Lake Baikal, but to a somewhat limited extent. It is expected that the Law on the Protection of Lake Baikal may be further weakened in the 2nd and 3rd hearings, e.g. by allowing privatization of land plots in settlements and SEZ, as well as allowing cutting of forests to fight pests and diseases (“sanitary cutting”). Almost certainly, the list of instances in which clearcut logging and forest land conversion is permitted will be extended to the “Baikal Harbor SEZ”, construction of airport and linear infrastructure.

Annex I was included in the Report upon request of the World Heritage Committee to perform an “analysis of Lake Baikal leg-

islation development and its proposed changes”. It only partially satisfies the request and contains numerous inaccuracies and omissions (e.g. it completely misrepresents the legal basis for water level management and omits the “Strategy for biodiversity conservation of the unique Lake Baikal ecosystem” adopted in 2001). Besides, Annex I directly contradicts the legislative amendments presented in Annex II, as it warns against broadening legal permission for clearcut logging, while proposed legislation is focused on opening to such logging, new areas under a wider spectrum of clauses.

Diminishing Law Enforcement

The report provides confusing information on enforcement but clearly states that the Environmental Enforcement Agency “*did not reveal any violations of environmental legislation requirements during construction of capital construction projects*”. Number of demolitions of illegal structures since 2018 is at best no more than 100 (and hardly any in 2023), while in 2017-2023 number of newly issued land ownership permits is more than 14500⁴. In 2024 several illegally built⁵ tourist facilities once shut down by enforcement agencies resumed their operations. The report also testifies that overall number of registered environmental violations by 2023 decreased by 32%. Since the start of the war, the Russian Government has severely restricted number of inspections and enforcement activities, thus encouraging violations of environmental laws. The new Baikal Environmental Prosecutor is publicly promoting a hands-off policy and has asked “not to pressure local authorities and businessmen”.



Fig. 2: Illegally Built Resort Baikalov Ostrog on Olkhon Island was shut down by court order but in 2024 again opens to tourists (2024).

Photo: <https://turbaza.ru/irkutskaya-oblast/id4764/>

Special Economic Zones (SEZ)

In the 15 years since the initial coastline landgrab for SEZ, only 5 residents actually invested something into SEZ. The government invested 3-6 times more in infrastructure than private businesses who were supposed to launch tourism develop-

⁴ <https://www.pnp.ru/social/fetisov-prizval-proverit-zakonnost-obrazovaniya-uchastkov-na-baykale.html?ysclid=llvsevo8je155265103>

⁵ <https://ircity.ru/text/ecology/2024/03/15/73322378/>

³ https://www.researchgate.net/publication/357506027_

ment. State-built oversized infrastructures are often left idle or work under capacity while their construction has caused huge permanent damage to the landscapes and local lifestyles. And now the legislators want to allow clearcut logging to expand areas affected by this “sustainable development”. From all residents of the “Baikal Harbor” SEZ in Buryatia Republic, only the Green Flow Baikal LLC has completed an ESIA. The other residents: AMAR LLC, Baikal Hermitage LLC, Putnik Siberia LLC, Cosmos Hotel Baikal LLC, Molodost Baikal LLC are still developing project documentation, and we hope that the World Heritage Committee will request those ESIA documents for review prior to the beginning of construction along the Lake Baikal shoreline.

Decommissioning of the Baikal Pulp and Paper Mill

This “clean up” operation with an implicit main aim to waste an enormous budget has slowed down significantly due to the war. Nevertheless the report testifies that 2 specific clean-up projects of the highest environmental risk have undergone an ESIA. Have WHC/IUCN received those ESIA Reports for review and will the results of such reviews be published?

Dam Plans in Mongolia

Unfortunately plans to build several dams in the Selenge River basin are still afloat. During the UNESCO/IUCN mission, a meeting with Mongolian experts was held, and materials on the projected Egiin-Gol Hydro were discussed. The Russian side insists that the documents submitted by the Mongolian side do not constitute an Environmental Impact Assessment (EIA) and need to be finalized. Will the IUCN review of the HPP ESIA be publicly disclosed? The Mongolian side promised that the ESIA for the Egiin Gol HPP will be submitted to the Russian side for consideration in 2024. The Russian Ministry of Natural Resources and Environment is studying the possibility to conduct studies of the impact of the projected Egiin-Gol HPP on Lake Baikal. However, the SEA for all dams in the Lake Baikal basin requested by the World Heritage Committee is not even mentioned in the report.

Crackdown on Civil Society

The report says nothing about civil society. Meanwhile an atmosphere of increasing intimidation and encouragement to lynch dissidents is very palpable in remote Siberian provinces, especially palpable from the onset of the war. All national chapters of international NGOs, which could address various Lake Baikal issues - WWF, Greenpeace, Bellona - have been shut down and labelled as “undesirable” by the Russian Government. The protection of Baikal was named by a Parliament member Yakubovsky the main reason for banning Greenpeace, which was, allegedly, initiated after his letter to the security agency. The remaining vocal local activists who dare to voice concerns about Baikal have been blackmailed and then taken to courts

for “defamation” by lawyers who are serving the land-grabbers. In Mongolia, the Director of Rivers without Boundaries, a prominent human-rights activist, Sukhgerel Dugersuren is still under criminal investigation for “cooperation with foreign agents” on environmental impact assessments of hydropower plants.⁶ The Mongolian Government failed to respond to several inquiries on this case made by the UN Human Rights Rapporteurs.

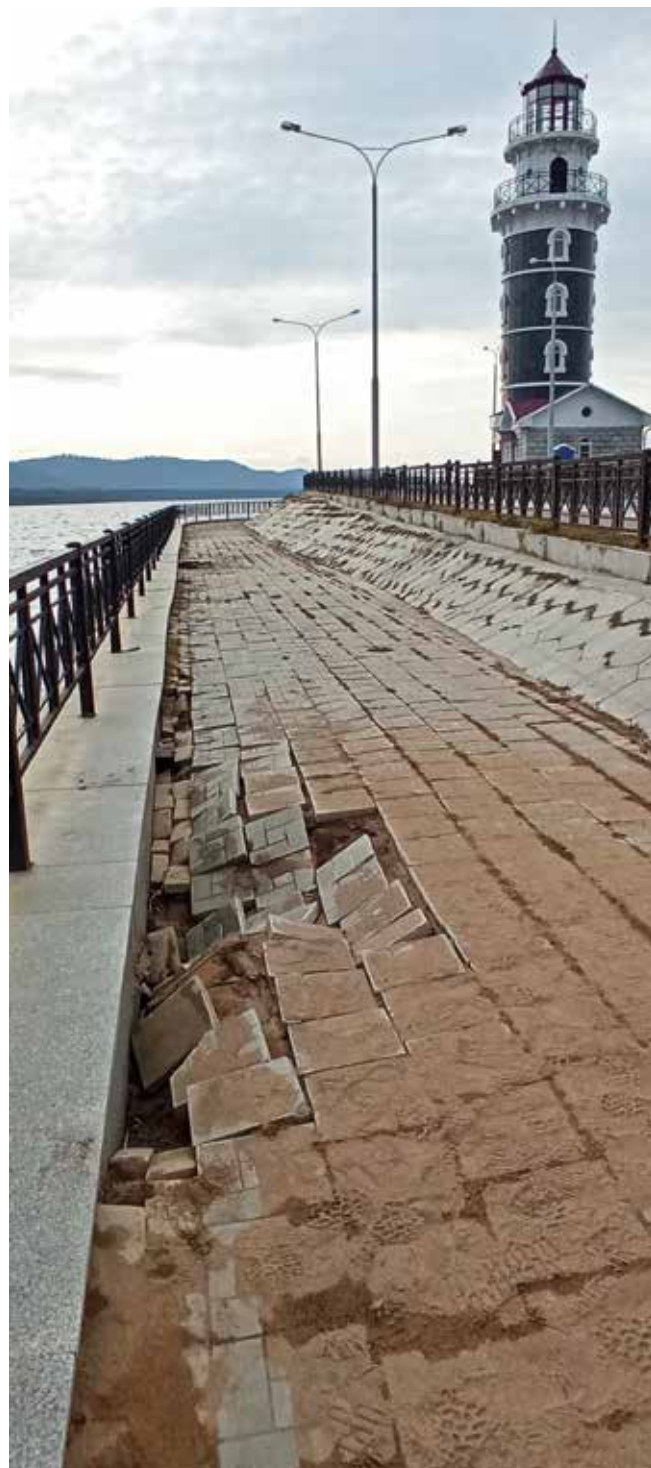


Fig. 3: Ageing Infrastructure of the Baikal Harbor Special Economic Zone (2021).

Photo: Rivers without Boundaries

“Volcanoes of Kamchatka” has a Chance to Restore its Protection Status

Anonymous authors



Fig. 1: Vilyuchinskaya Bay.

Photo: The authors

Despite the inspiring title of this article, the “Three Volcano Park” tourist project continues to be implemented.

On February 16, 2023, Deputy Prime Minister Yuri Trutnev approved a comprehensive plan for the implementation of the project. Let us mention some dates from this document:

- Registration of land plots for the tourist infrastructure construction – by November 2023;
- “Passenger suspension cable cars “Elevator D”, “Elevator E” with a panoramic complex on the volcano Vilyuchinsky”: construction and installation works start – June 2023, complete – January 2027;
- Highway to Vilyuchinskaya bay: design and survey work complete – September 2023, construction complete – October 2026;
- Creation of a passenger sea terminal in Vilyuchinskaya bay: project documentation development complete – March 2024, construction complete – May 2027;
- Tourist infrastructure in Vilyuchinskaya bay: design and survey works complete – December 2024, put into operation – September 2028;
- Park-hotel “Bay Zhirovaya”: design and survey works complete – September 2025, put into operation – September 2028.

A small hope for the preservation of the site appeared in September 2023, during the 45th session of the UNESCO World Heritage Committee.

The draft decision on “Volcanoes of Kamchatka” had a paragraph on inscribing Volcanoes of Kamchatka on the List of World Heritage in Danger since part of the property had lost

its protection status (in particular, the Zhirovaya and Vilyuchinskaya bays). During the session the decision was changed, as Russia promised to upgrade the status of the South Kamchatka Nature Park (of regional significance) to a National Park (federal significance) and create its buffer zone. The final decision of the World Heritage Committee invites Russian Federation to look into possibilities to extend the boundaries of the National Park to include the Vilyuchinskaya and Zhirovaya bays.

The Ministry of Natural Resources was supposed to submit documents to the government on the creation of the national park by November 1. On October 30, the “Earth Touches Everyone” project sent about 9 thousand signatures to the Ministry of Natural Resources for the expansion of the planned Kamchatka Volcanoes National Park with the Zhirovaya and Vilyuchinskaya bays¹.

By the beginning of 2024, we have no information on whether the Ministry of Natural Resources will take into account this suggestion.

However, in September, a few days after the closing of the World Heritage Committee session, Deputy Prime Minister of the Russian Federation Yuri Trutnev held a meeting on the implementation of the “Three Volcano Park” project. It was announced that geological and environmental surveys for camps in the area of Zhirovoy Bay had already been completed, a ski infrastructure concept and highways conceptual scheme had been developed.

The land plots allocated for the resort are located in the Advanced Special Economic Zone (ASEZ) (a special legal regime for the performance of entrepreneurial activities). Sergey Bachin, General Director of “Vasta Discovery”, raised the issue of the need to extend the ASEZ regime not only to the lease of land plots, but also to the adjacent sea area. Yuri Trutnev instructed the Federal Agency for Water Resources to work on this issue.

This could mean that the plans for the construction of a marine terminal in Vilyuchinskaya Bay and hotels in Zhirovoy Bay remain relevant. A threat to the OUV of the property remains.

¹ <https://earthtouches.me/news/2023/10/30/zemlja-peredala-okolo-9-tysjach-podpisej-za-rasshirenie-nacparka-vulkany-kamchatki/>

UNESCO / IUCN Must be Involved in the Sundarbans Strategic Environmental Management Plan

Sharif Jamil and Sultana Kamal, National Committee for Saving the Sundarbans (NCSS) and Dhoritri Rokhhay Amra (DHORA)



Since 2021, NCSS has been calling for the “Final” Strategic Environmental Assessment of the South-West region of Bangladesh for Conserving the Outstanding Universal Value (OUV) of the Sundarbans (SEA) and accompanying Strategic Environmental Management Plan (SEMP) to be revised with scientific integrity, transparency of data, robust public participation, and adequate assessment of all large industries and infrastructure that may impact the OUV of the Sundarbans. (Our detailed critique of the SEA is available in the World Heritage Watch report of 2023.)



Fig. 1: Infrastructure development nowadays commonly seen in the Sundarbans.
Photo: NCSS

In 2023, the World Heritage Centre and IUCN advised the World Heritage Committee that the Strategic Environmental Assessment for the Sundarbans of Bangladesh was insufficient, and that “further research was needed to more explicitly determine the potential impacts on the OUV of the property.” They advised that there was “no distinction between the impacts identified under the different development scenarios for the wider region and specific impacts on the OUV of the property”. Conclusions and mitigation measures appear to be based on assumptions (e.g. the tiger population will experience “healthy growth” under a “high-growth” development scenario if there is a “considerable reduction of anthropogenic pressure and improved management practice, suitable habitat improves and poaching is brought to a minimum”), and therefore their justifications and feasibility are unclear.

“The SEA also reports that the scale of the potential impact on the OUV is unknown and requires further research, and that

there is a clear risk of direct, indirect and cumulative impacts from developments in the study area over the next 20 years if appropriate and adequate mitigation measures are not taken, and that there remains a need to analyse potential risks and impacts in more detail. Factors such as climate change, freshwater availability, land conversion, or socio-economic benefits to local communities are not fully considered.”

They further advised the Committee to urge the State Party to “undertake further studies to specifically assess the potential risks and impacts of different scenarios on the OUV, which also consider factors such as climate change and freshwater flow, and that the findings of further studies inform future decision making to ensure the long-term protection of the OUV and avoid adverse impacts from large-scale industrial development in the vicinity of the property.”



Fig 2: The beautiful rivers are now bustling with watercraft transporting materials to various megaprojects.
Photo: NCSS

The 45 COM Committee scaled back that advice but did request the State Party to “continue to implement the SEMP in order to avoid direct, indirect and cumulative impacts from developments in the South-West region over the next twenty years that are identified in the SEA” and to “submit the additional studies and data-gathering framework outlined in chapter 4.8 of the SEMP to the World Heritage Centre for review as soon as they are completed.”

The specified studies are:

1. Water Hyacinth
2. Arsenic in Paddy Soils
3. Mud Crabs
4. Underwater noise
5. Conflicts over land use
6. Noise
7. Cropping
8. Risks to biodiversity and ecosystems from pollution
9. Biological oxygen demand



Fig. 3: The use of net confinement for shrimp culture is hindering the natural habitat of native fish in the Sundarbans Photo: NCSS

Because the Committee does not request a progress report on the Sundarbans until December 2025, and SEMP does not define timelines or methodologies for the studies, NCSS and DHORA urge the IUCN World Heritage Programme and the UNESCO World Heritage Centre to actively engage with the State Party on these studies throughout 2024 and 2025. Specifically, NCSS and DHORA urge the IUCN and World Heritage Centre to work with the State Party to ensure:

1. Public participation in the development and implementation of the studies, in line with the Guidance and Toolkit for Impact Assessments in a World Heritage Context.
2. Specification of timelines for the studies.
3. Implementation of the studies with the highest level of scientific rigor, including engagement of independent, third-party experts recommended by the IUCN World Heritage Programme;

4. Guidance is provided on how to evaluate impacts to OUV in each of the studies.
5. In the study on risks to biodiversity and ecosystems from pollution, the study should include:
 - a) Permanent air quality monitoring stations in Mongla, Harbaria, Akram Point, Payra/Patuakhali and Barisal (Taltoli) to measure PM_{2.5}, SO_x, NO_x, and mercury upwind, at, and downwind of the coal plants.
 - b) Immediate investigations of impacts of shipping accidents with spills of coal or coal ash in the waterways of the Sundarbans.
 - c) Groundwater testing below and downstream of coal ash dumps at the coal fired power plants.
 - d) Testing of coal ash and flue gas sludge dumps for radioactivity, heavy metals, and immediate investigations for evidence of leakage or spills after storms or floods.
 - e) Monitoring of mercury in soils and biota in concentric circles from 1 to 50 km from large coal-fired power plants.
 - f) Monitoring around coal jetties for evidence of coal dust and spills in waterways.



Fig. 4: As more megaprojects are being constructed, a greater number of marine transportation vessels come to the Sundarbans area. Photo: NCSS

NCSS and DHORA continue to advocate for the Sundarbans to be inscribed on the List of World Heritage in Danger for ongoing threats from industrialization, air, water and noise pollution, and increased shipping and maritime accidents.

Northern Okinawa: A Review of Japanese and U.S. Measures of Conservation is Urgent

Masami Mel Kawamura, Informed Public Project
Hideki Yoshikawa, Okinawa Environmental Justice Project

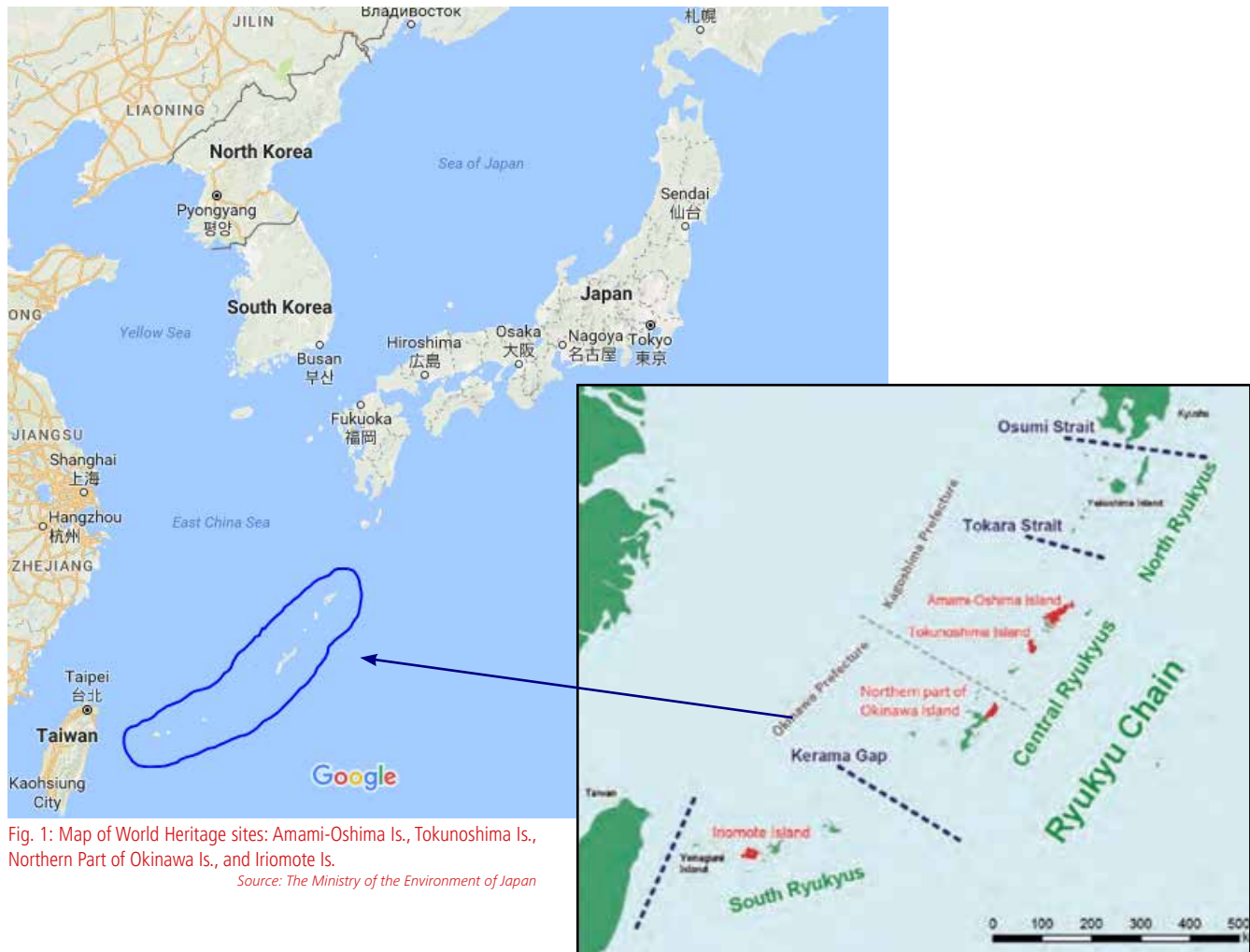


Fig. 1: Map of World Heritage sites: Amami-Oshima Is., Tokunoshima Is., Northern Part of Okinawa Is., and Iriomote Is.

Source: *The Ministry of the Environment of Japan*

It has been three years since the Northern Part of Okinawa Island (NPOI, also locally known as Yambaru forest) was inscribed as a UNESCO World Natural Heritage site in July 2021, along with Amami-Oshima Island, Tokunoshima Island, and Iriomote Island. The inscription process of the NPOI was controversial. The presence of the U.S. military's Northern Training Area (NTA) (3,533ha) next to the NPOI (7,721ha), its training, and military waste left in the former NTA area incorporated into the NPOI all presented threats to the Outstanding Universal Value (OUV) of the NPOI. The Japanese Ministry of the Environment underreported and misinformed about these threats in its 2017 and 2019 nomination dossiers.

Today, these threats remain, and the Ministry of the Environment still appears unable or unwilling to address them. Indeed, the Yambaru Wildlife Conservation Center Ufugi Nature Museum, the Ministry's flagship on-site museum providing information on the NPOI, presents no information on these threats.¹ Conversely, the very fact that the Ministry does not conduct studies on the impacts of the NTA, military training, and military waste on the OUV of the NPOI has enabled the Ministry not to address them as threats.

It has become clear that the reluctance and inability of the Ministry of the Environment and other government agencies to ad-

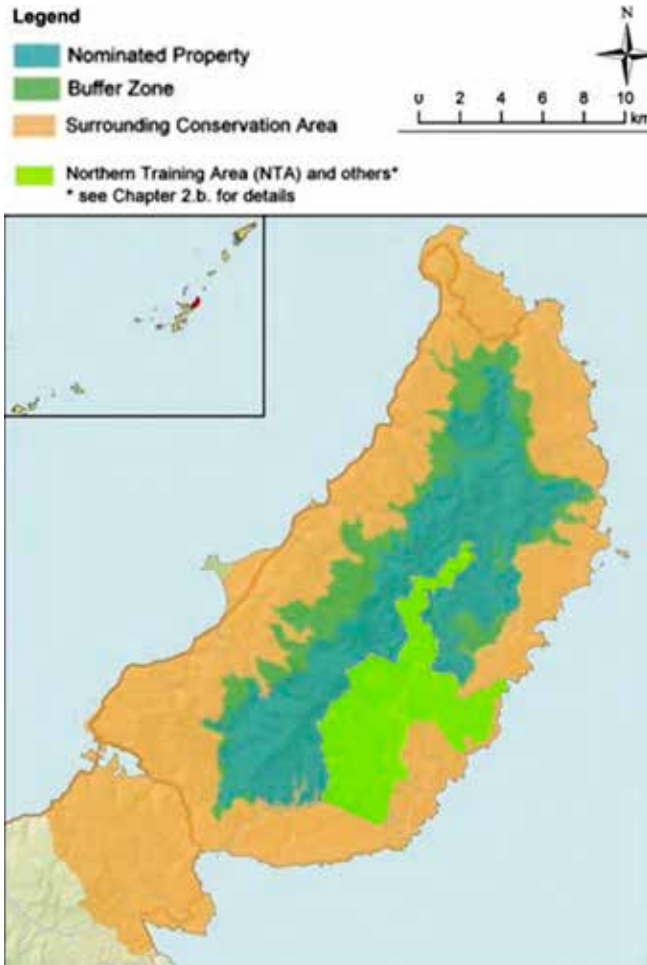


Fig. 2: Map of the Northern Part of Okinawa Island (NPOI) and the U.S. military's Northern Training Area (NTA). Source: The Ministry of the Environment of Japan

dress these issues is related to the fact that the Japanese Government prioritizes the U.S.–Japan security relationship over other matters. The "cooperation" documents and mechanisms created under the Status of Forces Agreement (SOFA) between the U.S. and Japan to "conserve the environment of the NPOI" are subject to the U.S. military's substantial discretion, and they cannot ensure the OUV of the NPOI. We call on the Japanese and U.S. Governments to conduct rigorous studies on these



Fig. 3: MV-22 Osprey aircraft flying over Okinawa woodpecker in May 2014. Source: Miyagi Okinawa

threats and enter into a new agreement based on the World Heritage Convention. We request that UNESCO and IUCN assist the governments in these endeavors. In the following, three issues are addressed to make our points.

U.S. Military's Waste Left in the NPOI

The Ministry of the Environment claimed in its 2019 World Heritage nomination dossier that ground and water contamination by U.S. military waste in the former NTA area incorporated into the NPOI had been cleaned up. Civil society members countered this claim by reporting to IUCN the presence of large but unknown quantities of military waste, including undetonated blanks and PCB-contaminated drums, in the NPOI.² Civil society also called on the Japanese government, in collaboration with the U.S. military, to clean up the waste.

Recently, information obtained by The Informed Public Project through the Japanese Act on Access to Information Held by Administrative Organs has revealed that both the Ministry of the Environment and the Okinawa Prefectural Government were well aware of the continuous presence of military waste in the then-nominated NPOI before the IUCN's field visit was made in October 2017.³ The Prefectural Government debated whether to discuss the matter with the Ministry of the Environment and worried about how such information would affect the IUCN's decision-making. It is unclear whether and how the Ministry and the Prefectural Government informed the IUCN field examiners of this critical information during their field visit.⁴



Fig. 4: U.S. military's blank shells and grenades left in NPOI in 2022. Source: Okinawa Defense Bureau Report (2022)

Today, the Okinawa Defense Bureau continues to find and clean up the U.S. military's waste left in the NPOI.⁵ In a meeting with NGOs, the Ministry of Defense informed that the Bureau intends to continue its efforts until the remaining military waste in the NPOI is cleaned up and the environment is restored.⁶ Moreover, in response to civil society requests, it has put up a sign at the main gate of the NTA, asking people to contact the Bureau or the Okinawa District Forest Office if they find mili-

tary waste. The Bureau has also provided copies of its reports on its clean-up and restoration efforts to the Ministry of the Environment.



Fig. 5: Warning sign of a missing grenade in NPOI and closure of NPOI

Photo: Akino Miyagi

The Ministry of the Environment, the Ministry of Defense, and the Forest Office recognize the presence and danger of U.S. military waste in the NPOI. In fact, they closed the NPOI for safety reasons after an old hand grenade the Okinawa Defense Bureau collected and stored at a temporary site in the NPOI for later disposal went missing in December 2023.⁷

The Ministry of the Environment has failed to take proper action, however. Despite repeated requests from civil society, it has not erected signboards around the NPOI warning visitors of dangerous military waste. The lack of such signboards may cause visitors to be inadvertently exposed to dangerous military waste, undermining the integrity of the World Heritage system.

Regrettably, the Ministry of the Environment has yet to share with the UNESCO World Heritage Centre and IUCN the information the Okinawa Defense Bureau has provided to the Ministry, despite repeated requests from civil society. In a recent meeting with NGOs, the Ministry officials insisted that they found it unnecessary to provide such information to UNESCO and IUCN since the *Operational Guidelines for the Implementation of the World Heritage Convention* do not require the Ministry to do so.⁸ The Ministry officials have expressed, however,

that if the UNESCO World Heritage Centre and IUCN request the Ministry to do so, it will consider submitting reports on military waste to the Centre and IUCN.

Impacts of the U.S. Military's Training on the NPOI

The U.S. Military conducts "jungle warfare training," aircraft flight training, including take-off and landing training, and other types of training in the NTA.⁹ The Ministry of Environment considers the NTA a de facto buffer zone for the NPOI. Aircraft flight training unavoidably includes flying over the NPOI at significantly low altitudes. Noise pollution emitted from helicopters and MV Osprey, and the low-frequency sound waves and "downwash" from MV Osprey should be considered severe threats to the endangered indigenous species inhabiting the NTA and NPOI. Any aircraft accidents in the Yambaru forest have the potential to cause a forest fire that may destroy the OUV of the NPOI. In fact, in October 2017, a US military helicopter crashed into a farmland near the NPOI, causing extensive damage to it.¹⁰



Fig. 6: In September 2019, a U.S. military helicopter "accidentally" landed in the then-World Heritage-nominated NPOI.

Photo: Akino Miyagi

Recently, the Japanese Self-Defense Forces (SDFs) and other countries' military forces have begun training with the U.S. military in the NTA.¹¹ While the Japan Environmental Governing Standards (JEGS) provide guidelines for the U.S. military to follow for the protection of the environment, it is unclear whether any concrete plans and measures have been established for their joint training and, if so, whether and how they have been implemented to ensure the OUV of the NPOI.

The NTA is expected to be littered with the U.S. military's waste because it is an active military training site. This is a logical conclusion, given that the former NTA area, now incorporated into the NPOI, is littered with dangerous military waste. The presence of accumulating military waste in the NTA should be considered a threat to the OUV of the NPOI.

Regrettably, there has been no sufficient information on the impacts of the U.S. military's training and military waste in the NTA on the OUV of the NPOI. Despite civil society's repeated requests, the Ministry of the Environment has not studied their

impacts. In a meeting with NGOs, the Ministry officials explained that their monitoring aims to study the overall condition of the specific species and do not distinguish the impacts of military training from those of others.¹² Also, despite requests from civil society, the US military has not released studies on the impact of MV-Osprey on the NPOI.



Fig. 7: U.S. military trucks lining the road near NPOI.

Photo: Akino Miyagi

“Cooperation” Documents

In its 2019 nomination dossier, the Ministry of the Environment included a “cooperation” document between the Japanese and U.S. governments. It showed that the governments designated the Environmental Subcommittee of the U.S.–Japan Joint Committee as a mechanism for “effective cooperation to conserve the natural environment in the NPOI.” In July 2023, the Ministry issued a new “cooperation” document: It stipulates that both governments will “take necessary measures for biodiversity... throughout the wide range of the northern part of Okinawa Island,” “cooperate to maintain the Natural and Cultural Resources Plan of the Northern Training Area,” and “promote partnership between local communities and USFJ local components.”¹³

While we appreciate both governments’ efforts to create these documents and mechanisms, we have to conclude that the 2019 cooperation document and the Environmental Subcommittee have failed to bring about effective changes regarding military training and studies of its impacts on the NPOI, as discussed above. We are also concerned that the new 2023 cooperation document appears to follow the same fate as the previous document. In fact, the meeting plan, which was mediated by the Ministry of the Environment between the Okinawa Prefectural Government, municipalities, civil society members, and the U.S. military in Okinawa to be held in early 2024 following its “partnership” clause, was suddenly cancelled by the U.S. military.¹⁴

Our review of the documents and our communication with the Ministry of the Environment suggests that they may lack binding status. Despite our requests for the full release of the

documents, including the date of signing, the names of the signers, and the status of the documents, the documents we have received so far have been redacted. We now suspect that these documents do not bear such information, and the redacted parts may be blank. Moreover, it has become clear that the cooperation documents made under the U.S.–Japan Status of Forces Agreement give priority to the concerns and undertakings of the U.S. military over safeguarding and ensuring the Outstanding Universal Value (OUV) of the NPOI. The U.S. military has substantial discretionary power in the implementation of these documents and mechanisms.



Fig. 8: Redacted Document.

Source: The Ministry of the Environment of Japan

Recommendations

Given the situation discussed above, we propose the following recommendations.

1. In accordance with Article 5 of the *Convention Concerning the Protection of the Cultural and Natural Heritage (World Heritage Convention)* and Article 15 and Article 15-n of the *Operational Guidelines for the Implementation of the World Heritage Convention (Operational Guidelines)*, the Ministry of the Environment provide UNESCO and IUCN with information on the Okinawa Defense Bureau’s efforts to clean up the U.S. military’s waste left in the NPOI and restore the environment. The UNESCO World Heritage Centre and IUCN request the Ministry provide such information for them.
2. In accordance with Article 6 of the *World Heritage Convention* and Article 15 of the *Operational Guidelines*, the Ministry of the Environment, in cooperation with the U.S. military, should conduct rigorous scientific studies to assess the impacts of the NTA, military training, and military waste in the NPOI and NTA on the OUV of the NPOI and take appropriate measures, including stopping training, to ensure the OUV of the NPOI.

3. In accordance with Articles 4, 5, 6, and 7 of the *World Heritage Convention* and Article 15 of the *Operational Guidelines*, the Japanese and U.S. governments enter an agreement under the UNESCO World Heritage Convention to ensure the Outstanding Universal Value (OUV) of the NPOI. The U.S. Department of the Interior and its National Park Service, which oversees matters related to World Heritage, need to be involved. UNESCO assists in this undertaking of the two governments.¹⁵

Notes

- 1 See the website of the Center at: <https://www.ufugi-yambaru.com/>
- 2 The Informed Public Project (2019). "Yanbaru Forest: Future World Heritage and the U.S. Military's Northern Training Area." <https://ipp.okinawa/wp-content/uploads/2019/10/ce95c812e2d-55f36ed48660b39dda4f3.pdf>
- 3 The Informed Public Project (2024). "Kankyosho mo okinawaken mo shit-teita: hokubukunrenjiyo henkan atochi ni nokosareta mono [Environment Ministry and Okinawa Prefecture were all aware: the presence of waste materials in the former Northern Training Area]." <https://ipp.okinawa/2024/05/04/moe-okiprefg-knew/>
- 4 Shioiri, Yuichiro (2024). "Sekai-isan eno eikyowo kenenka shinsato kasanatta kunrenchi no henkan nokosareta beigun haikibutsu boueisho ninshiki shingara jyokyosagyoshuryo [Concern for impact of nomination process? Field examination coincided with the return of military training area. The Ministry of Defense recognized the presence of U.S. military waste, but declared "The cleanup had been finished."]. *The Okinawa Times*. January. 16, 2024. <https://www.okinawatimes.co.jp/articles/-/1291481>
- 5 IDEA Consultants, Inc. (Ministry of Defense contracted company) (2023). *Hokubukunrenjiyo henkan-atochi haikibutsu chosa gyomu hokukokusho* [Report on waste materials in the returned areas of the Northern Training Area]
- 6 NGO meeting with the Ministry of Defense. December 1, 2023.
- 7 Burke, Mathew and Higa, Mari (2024). "Japan apologizes after grenade goes missing from former U.S. military training site." *Stars and Stripes*. January 16, 2024. https://www.stripes.com/branches/marine_corps/2024-01-16/japan-grenade-missing-training-site-12690543.html
- 8 NGO meeting with the Ministry of the Environment. April 12, 2024.
- 9 See, for example, this U.S. Marine Corps promotional video "Hard Training Makes Hard Marines" for its "jungle training." <https://www.marines.mil/News/Marines-TV/video/465390?dvpTag=Jungle+Warfare+Training&videoid=804569>
- 10 *Kyodo News* (2017). "U.S. military chopper bursts into flames on landing in Okinawa." October 11, 2017. <https://english.kyodonews.net/news/2017/10/edbc37dcb9c7-update1-us-military-chopper-bursts-into-flames-on-landing-in-okinawa.html>
- 11 Watanabe, Takashi (2024). "GDSDF, U.S. military practice retaking remote Japanese isles." *The Asahi Shimbun*. March 13, 2024. <https://www.asahi.com/ajw/articles/15197048>
- 12 NGO meeting with the Ministry of the Environment. December 2, 2023.
- 13 The Ministry of the Environment (2023). "Bilateral Cooperation for Conservation of Natural Environment in the Northern Part of Okinawa Island Designated as a World Heritage Site." <https://www.env.go.jp/content/000149378.pdf>
- 14 H. Yoshikawa's communication with an officer from the Ministry of the Environment. January 22, 2024.
- 15 H. Yoshikawa's communication with an officer from the Ministry of the Environment. January 22, 2024.

The Great Barrier Reef: Australia's Ongoing Climate Mitigation Failures

Noni Austin, Earthjustice



In 2023, the World Heritage Committee requested Australia to implement fully all recommendations from the joint World Heritage Centre and IUCN reactive monitoring mission to the Great Barrier Reef in 2022.¹ This includes, as “a matter of utmost priority,” reviewing and strengthening the Reef 2050 Plan² “to include clear government commitments to reduce greenhouse emissions consistent with the efforts required to limit the global average temperature increase to 1.5°C above pre-industrial levels, to limit the impacts of climate change” on the Reef’s Outstanding Universal Value (OUV).³

For the reasons below, Australia is failing to fulfil the Committee’s request. At its 2024 meeting, the World Heritage Committee should:

- Note that scientific evidence demonstrates that the average global temperature increase must be limited to well below 1.5°C to ensure the Reef’s survival and protect its OUV.
- Express concern that Australia’s current emissions reduction target is inconsistent with limiting warming to 1.5°C.
- Make clear that Australia’s obligation to reduce emissions consistent with limiting warming to 1.5°C includes taking steps to rapidly phase out the production and export of fossil fuels, refusing approval of all new or expanded fossil fuel projects, and immediately winding down fossil fuel subsidies.
- Inscribe the Reef on the List of World Heritage in Danger and adopt the relevant corrective measure identified by the 2022 monitoring mission,⁴ making clear that the measure requires Australia to phase out the production and export of fossil fuels, refuse approval of all new or expanded fossil fuel projects, and wind down fossil fuel subsidies.

- Urge all state parties to align themselves with efforts consistent with limiting global average temperature increase to 1.5°C.

Recent mass bleaching on the Great Barrier Reef

The Great Barrier Reef has recently suffered its fifth mass coral bleaching in the past eight summers, with heat stress in early March 2024 “reaching record levels on large parts” of the Reef.⁵

A report published in April 2024 by the Australian Institute of Marine Science and the Great Barrier Reef Marine Park Authority states that “prolonged heat exposure [between December 2023 and March 2024] has caused mass bleaching of coral reef communities observed within all three regions of the Great Barrier Reef. The combination of aerial ... and in-water surveys in 2024 confirm a mass bleaching event, with prevalent and extreme bleaching observed at multiple reefs in all 3 regions of the Great Barrier Reef Marine Park.”⁶ Images from the aerial surveys are included below at Fig. 3–5.

The report notes that 1,080 reefs were surveyed from the air between the Torres Strait in the north (which is outside the Great Barrier Reef marine park/world heritage area) and the Capricorn Bunker Group at the southern end of the Great Barrier Reef marine park/world heritage area, with 1,001 reefs having sufficient coral cover and visibility to record a bleaching response observation.⁷ Fig. 2 below shows the locations and observations of these surveys. Fig. 1 below describes the survey results in greater detail, concluding that the shallow reef habitats of 39% of surveyed reefs within the marine park/

Aerial Survey Score	Aerial Survey Score description	GBRMP (count)	GBRMP (%)	TS (count)	TS (%)	Whole GBR (%)
0	No Bleaching	97	12%	112	60%	21%
1	Low Bleaching (1–10%)	119	15%	63	34%	18%
2	Medium Bleaching (11–30%)	107	13%	8	4%	12%
3	High Bleaching (31–60%)	172	21%	2	1%	17%
4	Very High Bleaching (61–90%)	252	31%	1	1%	25%
5	Extreme Bleaching (>90%)	68	8%	0	0%	7%
Total reefs with aerial survey score		815		186		

Fig. 1: 2024 aerial survey observations of bleaching prevalence within the Great Barrier Reef Marine Park (GBRMP), Torres Strait (TS), and across the whole of GBR ecosystem (Whole GBR = GBRMP + TS). Total reef count and percentage of surveyed reefs by bleaching prevalence and region.⁹

*21 reefs within the Great Barrier Reef Marine Park and 58 reefs within the Torres Strait region were not scored due to having no live coral visible or surveyors could not view the coral reefs due to sediment or water depth on top of reef.

world heritage area showed very high or extreme prevalence of bleaching (meaning greater than 60% of coral cover was bleached) and 79% of all surveyed reefs showed some level of coral bleaching.⁸

Although bleached corals may survive, Professor Terry Hughes noted in March 2024 that “Given the near-record levels of heat stress this summer, we can expect heavy losses of corals to occur on hundreds of individual reefs over the next few months.”¹⁰

Australia’s emissions reduction target is inconsistent with limiting warming to 1.5°C

Australia presents its national emissions reduction target, alongside other climate policies, as evidence it is fulfilling its obligations under the World Heritage Convention to do all it can to the utmost of its resources to protect the Great Barrier Reef’s OUV.¹¹

However, Australia’s target is inconsistent with efforts required to limit warming to 1.5°C or below, despite indisputable evidence that this is required to protect the Reef’s OUV. Experts have concluded that:

- The target – 43% below 2005 levels – is consistent with around 2°C of warming, not 1.5°C or below.¹²
- Australia’s fair share 2030 target must be strengthened significantly to at least 67% below 2005 levels by 2030 with net-zero emissions by 2038, for a 50% probability of limiting warming to 1.5°C.¹³

This is significant because the Reef’s OUV will deteriorate to a far greater extent at 2°C of warming than at 1.5°C or below of warming.¹⁴

The 2022 monitoring mission report expressed concern about Australia’s “lack of a clear pathway ... to the 1.5°C target,” noting “mitigation elements of the [Reef management] plans are relying on offset and credit schemes, prioritizing sequestration over real-term emissions reductions and risking tangible net benefits.... Mitigation efforts in terms of net reductions in emissions continue to fall below the internationally recognized accepted standard for reef protection.”¹⁵

Since that time, the federal government has taken some steps to assist the country to meet its emissions target.¹⁶ In March 2023, the federal parliament passed amendments to Australia’s Safeguard Mechanism, which applies to facilities that emit more than 100,000 tonnes of carbon dioxide equivalent (CO₂e) per year. The reforms are intended to cap emissions with a ratchet down formula.¹⁷ However, the mechanism permits operators to use carbon credit schemes – the integrity of which have been questioned by experts – to meet their emissions baseline, which reduces absolute emissions cuts.¹⁸ It is also unclear how the re-

forms will impact the development of new or expanded fossil fuel projects, and the mechanism does not address the impact of Australia’s exported emissions (discussed below).

Australia’s ongoing fossil fuel production and export contributes to global warming and the deterioration of the Reef

Australia is one of the world’s largest exporters of coal and liquefied natural gas. A 2019 study concluded that only Russia and Saudi Arabia export more CO₂e per year.¹⁹ As the monitoring mission noted, “[t]he consequential emissions associated with [fossil fuel exports] from Australia have been estimated to account for around 8.6 % of total greenhouse gas emissions in Asia and the Pacific and about 4 % of global emissions.”²⁰

Australia is also determined to continue expanding its fossil fuel exports, and the government continues to provide significant subsidies for fossil fuel production and refuses to ban new fossil fuel projects.²¹ An analysis of the 116 new coal, oil, and gas projects in the development pipeline as of December 2022 concluded that these projects, if they proceeded as planned, would result in 4.8 billion tonnes of greenhouse pollution by 2030.²² This does not include several additional vast onshore and offshore gas basins currently under exploration and development.²³ Although the Safeguard Mechanism could reduce emissions associated with some of these projects, it does not – as noted above – address the exported emissions from these projects.

Australia’s failure to address emissions released beyond its borders is inconsistent with its obligations under the Convention to do all it can to the utmost of its own resources to protect its world heritage properties, including by aligning its actions with limiting warming to 1.5°C. It also fails to recognize that obligations under the World Heritage Convention are independent of those under the United Nations Framework Convention on Climate Change and the Paris Agreement, and that the UNFCCC and Paris Agreement do not preclude other treaty bodies – such as the World Heritage Committee – from addressing national-level climate mitigation obligations where climate change affects matters within the purview of those treaty bodies.²⁴

The continuation and expansion of fossil fuel production in Australia directly contradicts the rapid and deep emissions reductions in all sectors²⁵ that Australia must take to act consistently with limiting warming to 1.5°C.

The Great Barrier Reef should be inscribed on the List of World Heritage in Danger in 2024

At its 2024 session, the Committee will consider the Reef’s possible inscription on the List in Danger. The 2022 monitoring mission recommended the Reef’s inscription due to, among

other things, the threat of climate change to the OUV and the lack of clear climate measures.²⁶

The Reef should be inscribed on the List in Danger in 2024, for the following reasons:

- The science is clear that the Reef meets the inscription criteria. As the monitoring mission noted, “Climate factors (human-induced) are having a considerable impact on the OUV of the property; with models suggesting that with increased temperatures the more extreme weather conditions anticipated (floods, cyclones etc.) will also escalate damages to the property and loss of its OUV.”²⁷ In 2020, the IUCN concluded that the Reef is one of only two natural properties to enter the “critical” conservation outlook category since the last assessment in 2017.²⁸

- Inscription of a property on the List in Danger due to the threat and impact of climate change is consistent with the Convention itself and the Policy Document on Climate Action for World Heritage, adopted by the General Assembly of States Parties in 2023.²⁹

- Although Australia alone cannot solve the climate crisis, this does not absolve it of its responsibilities under the Convention to protect the Reef’s OUV by reducing emissions consistent with limiting warming to 1.5°C.

The corrective measure proposed by the monitoring mission should be adopted to require Australia to reduce emissions consistent with limiting warming to 1.5°C,³⁰ making clear that this requires Australia to phase out the production and export of fossil fuels, refuse approval of all new or expanded fossil fuel projects, and wind down fossil fuel subsidies. All state parties to the Convention should also be requested to fulfil their obligations under article 6 (3) by refraining from taking deliberate measures that are inconsistent with efforts required to limit warming to 1.5°C.³¹

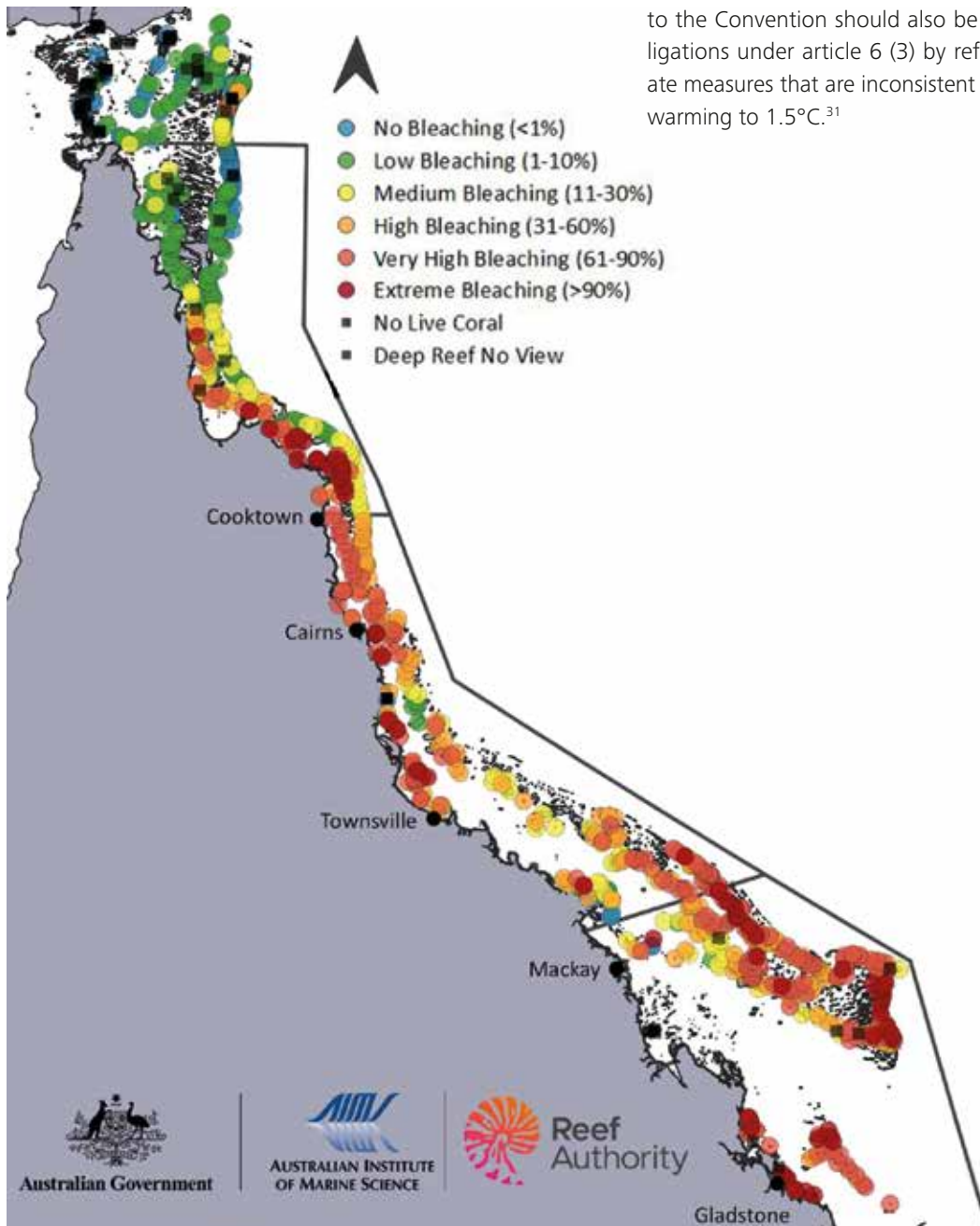


Fig. 2: 2024 aerial survey observations of bleaching prevalence in shallow-water coral communities throughout the Great Barrier Reef.³²

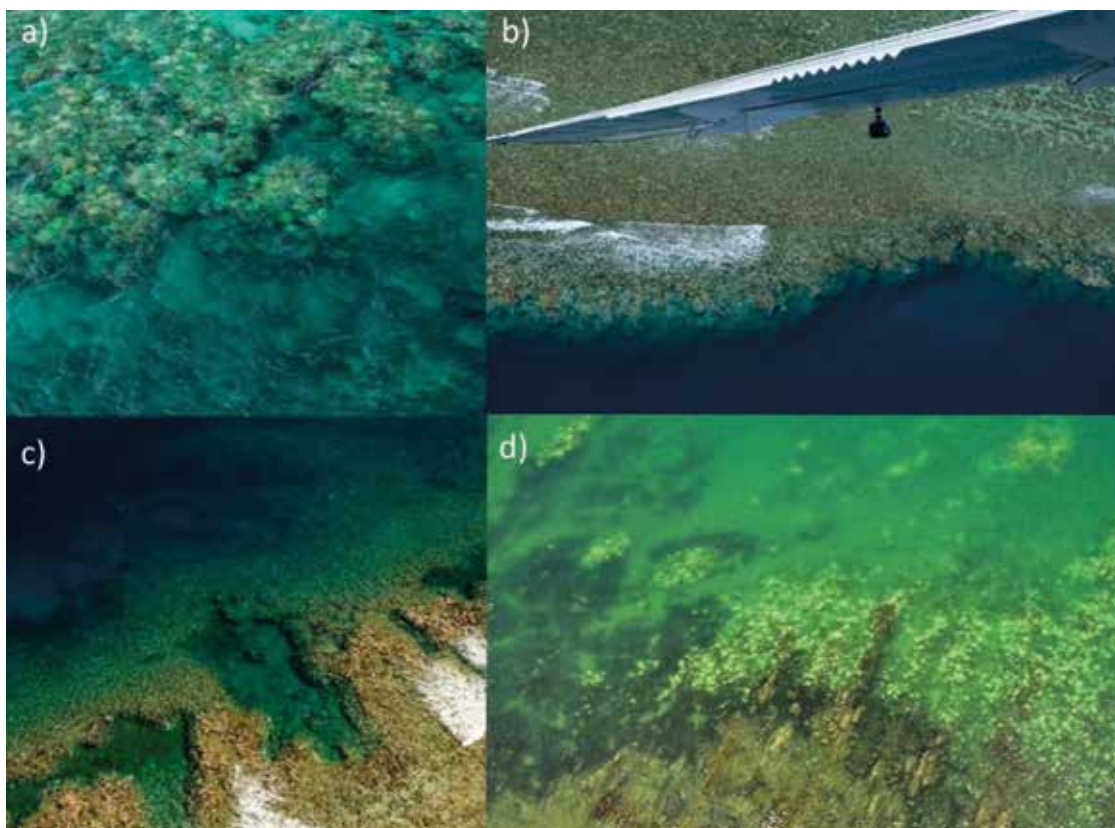


Fig. 3: Offshore (a,b,c) and inshore (d) reefs in the southern Great Barrier Reef with very high (60-90% cover bleached; a & c) and extreme (>90% cover bleached; b & d) bleaching prevalence clearly visible from aerial surveys. Photos: AIMS / Dr Neal Cantin³³

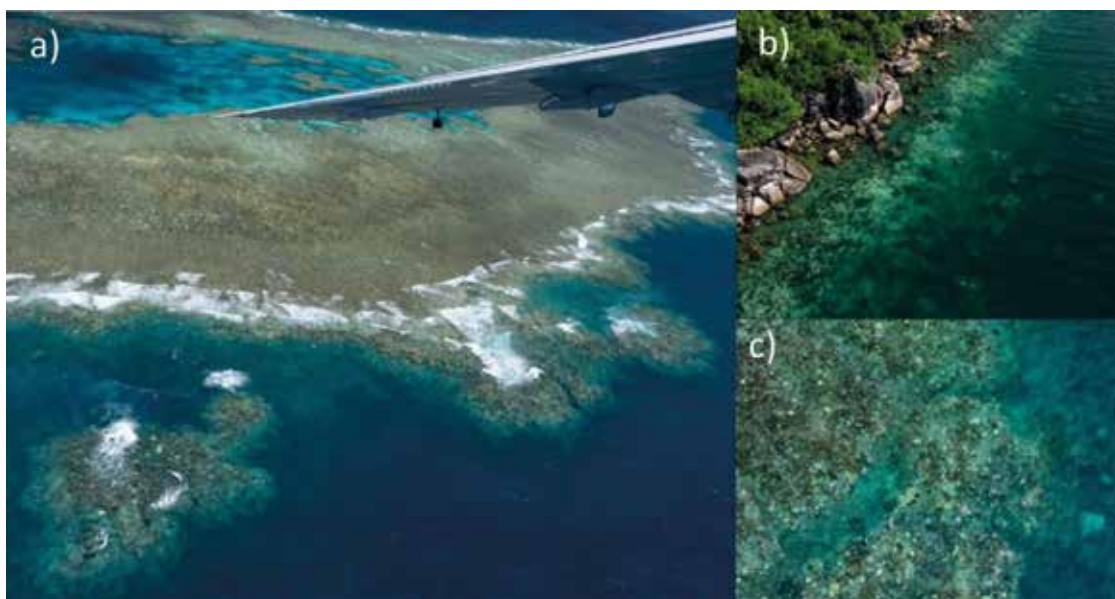


Fig. 4: Offshore (a & c) and inshore (b) reefs in the central Great Barrier Reef with very high (60-90% cover bleached; a & c) and extreme (>90% cover bleached (b)) bleaching prevalence clearly visible from aerial surveys. Photos: AIMS / Dr Neal Cantin³⁴

Notes

- 1 45 COM 7B.13, para. 4.
- 2 The Reef 2050 Plan is Australia's framework for managing the Great Barrier Reef World Heritage Area until 2050. The plan was last updated in December 2021.
- 3 45 COM 7B.13, para. 4(f). Since the Committee's decision in September 2023, the General Assembly of States Parties to the Convention adopted the Policy Document on Climate Action for World Heritage in November 2023. This policy states at para. 94 that implementation of the World Heritage climate action goal for mitigation "could be supported by ... pursuing pathways that contribute to limiting global warming to 1.5°C, with no or limited overshoot."
- 4 E. Carter (IUCN) and H. Thulstrup (UNESCO), Report on the joint World Heritage Centre/IUCN reactive monitoring mission to the Great Barrier Reef (Australia) from 21 to 30 March 2022 ("2022 Reactive Monitoring Mission Report"), p. 54 (in relation to Recommendation P6).
- 5 Prof. T. Hughes, The Conversation, The Great Barrier Reef's latest bout of bleaching is the fifth in eight summers – the corals now have almost no reprieve (Mar. 9, 2024), <https://theconversation.com/the-great-barrier-reefs-latest-bout-of-bleaching-is-the-fifth-in-eight-summers-the-corals-now-have-almost-no-reprieve-225348>.
- 6 Australian Institute of Marine Science / Commonwealth of Australia (Reef Authority), Aerial surveys of the 2024 mass coral bleaching event on the Great Barrier Reef, p.1, https://www.aims.gov.au/sites/default/files/2024-04/FINAL-Aerial%20Bleaching%20GBR2024Report_AIMS_Final_15Apr2024_0.pdf.

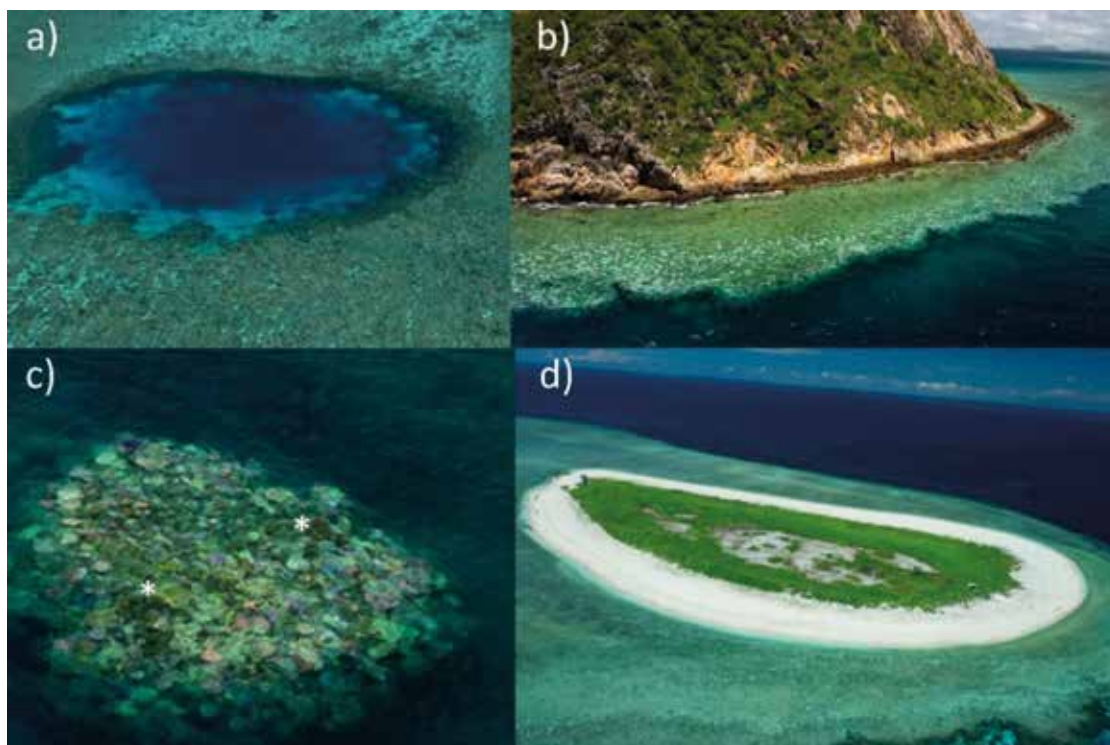


Fig. 5: Mid-shelf (b & c) and offshore reefs (a & d) in the northern Great Barrier Reef that displayed variable levels of bleaching prevalence from no bleaching (a & d) to extreme (>90% cover bleached; b & c) including recent mortality (indicated by the * symbols in panel c) that is clearly visible from aerial surveys. Photos: AIMS / Dr Neal Cantin³⁵

7 Id., p. 2.

8 Id., pp. 2, 5.

9 Id., Table 1 (p. 5).

10 Prof. T Hughes, The Great Barrier Reef's latest bout of bleaching is the fifth in eight summers, above n 5.

11 State of conservation report by State Party (add.info.) (10 Mar. 2023), pp. 2, 5, available at <https://whc.unesco.org/en/list/154/documents/>.

12 See e.g., Climate Analytics, Australian election 2022 – Political party and independent climate goals: analysis (2022), https://climateanalytics.org/media/auselection22_partyclimategoals_climateanalytics_1.pdf; Climate Action Tracker, Australia (updated 11 Dec. 2023), <https://climateactiontracker.org/countries/australia/>.

13 A/Prof M. Meinshausen and Dr. Z. Nicholls, Climate Resource, Updated assessment of Australia's emission reduction targets and 1.5°C pathways (June 2023), https://www.climate-resource.com/reports/wwf/20230612_WWF-Aus-Targets.pdf.

14 Great Barrier Reef Marine Park Authority, Great Barrier Reef Outlook Report 2019 (2019), Figure 10.2 (p. 265).

15 2022 Reactive Monitoring Mission Report, above n 4, pp. 41, 52.

16 The World Heritage Committee has recognized Australia's increased actions to address climate change. 45 COM 7B.13, para. 5.

17 See generally Australian Government, Safeguard Mechanism, <https://www.dcceew.gov.au/climate-change/emissions-reporting/national-greenhouse-energy-reporting-scheme/safeguard-mechanism>.

18 See e.g., Prof. A. Macintosh and Prof. D. Butler, The Conversation, The unsafe Safeguard Mechanism: how carbon credits could blow up Australia's main climate policy (10 Nov. 2023).

19 T. Swann, The Australia Institute, High carbon from a land down under (Jul. 2019), https://australiainstitute.org.au/wp-content/uploads/2020/12/P667-High-Carbon-from-a-Land-Down-Under-WEB_0_0.pdf.

20 2022 Reactive Monitoring Mission Report, above n 4, pp. 34-35.

21 See e.g., SEI, Climate Analytics, E3G, IISD, and UNEP, The Production Gap: Phasing down or phasing up? Top fossil fuel producers plan even more extraction despite climate promises (2023), pp. 54-55.

22 High carbon from a land down under, above n 19, pp. 3, 6, 15-16.

23 Id., pp. 9-10.

24 For a detailed legal analysis, see www.earthjustice.org/worldheritagelegalanalysis and www.earthjustice.org/worldheritageclimatepolicy.

25 See Policy Document on Climate Action for World Heritage (2023), paras. 58, 78.

26 2022 Reactive Monitoring Mission Report, above n 4, p. 53.

27 Id., p. 52.

28 IUCN, IUCN World Heritage Outlook 3 – A conservation assessment of all natural World Heritage sites (Nov. 2020), pp. vii, 22. "Critical" means that the "site's values are severely threatened and/or deteriorating. Immediate large-scale additional conservation measures are needed to maintain and/or restore the site's values over the short to medium term, or the values may be lost." Id., p. 3.

29 Article 11(4) of the Convention permits inscription on the List in Danger of properties "threatened by serious and specific dangers." As the 2023 Policy Document on Climate Action for World Heritage recognizes, art. 11(4) is "sufficiently broad to include the impacts of climate change as serious and specific danger to properties." Policy Document on Climate Action for World Heritage (2023), para. 32. Detailed legal analysis of art. 11(4) is available at www.earthjustice.org/worldheritagelegalanalysis and www.earthjustice.org/worldheritageclimatepolicy.

30 2022 Reactive Monitoring Mission Report, above n 4, p. 54 (in relation to recommendation P6).

31 In the context of climate change, art. 6(3) clearly prohibits any deliberate measures that might cause or contribute to the climate change which is harming world heritage properties. Given the scientific consensus that greenhouse gas emissions fuel climate change, measures that are inconsistent with limiting warming to 1.5°C are "deliberate measures which might damage" world heritage properties in other states directly or indirectly. See www.earthjustice.org/worldheritagelegalanalysis and www.earthjustice.org/worldheritageclimatepolicy.

32 Australian Institute of Marine Science / Commonwealth of Australia (Reef Authority), Aerial surveys of the 2024 mass coral bleaching event on the Great Barrier Reef, above n 6, Map 1 (p. 3).

33 Australian Institute of Marine Science / Commonwealth of Australia (Reef Authority), Aerial surveys of the 2024 mass coral bleaching event on the Great Barrier Reef, above n 6, Image 1 (p. 6).

34 Australian Institute of Marine Science / Commonwealth of Australia (Reef Authority), Aerial surveys of the 2024 mass coral bleaching event on the Great Barrier Reef, above n 6, Image 2 (p. 7).

35 Australian Institute of Marine Science / Commonwealth of Australia (Reef Authority), Aerial surveys of the 2024 mass coral bleaching event on the Great Barrier Reef, above n 6, Image 3 (p. 7).

Annex

The Authors



John Adams

John Adams OBE, a social work graduate, had a long career in the voluntary and statutory sectors, working at senior level for some of the UK's largest health and disability charities. He lives in West Wiltshire and has been a trustee of several charities; he has held several public appointments including the Chair of the Department of Health's Voluntary & Community Sector Sounding Board and Justice of the Peace. John was awarded the OBE in recognition of his national contribution to social care. He campaigns against the government's road building plans for Stonehenge World Heritage Site and has been the Chairman of the Stonehenge Alliance for the past three years.

Contact: ebble@btinternet.com

Abdurrahim Ahmadi

Abdurrahim Ahmadi was born in Bamiyan, Afghanistan in 1988. He graduated from Kabul Polytechnic University Architecture Department in 2013 and worked as a senior Architect in Bamiyan Urban Development and Housing Directorate until 2017. After that, he joined a master's Course in Urban Analysis and Management at Florence University of Italy. He was part of the Bamiyan Strategic Master Plan project from 2017 - 2018, and a member of the technical team of this project in Afghanistan when it was handed over in 2018. Again he joined his colleagues in Urban Development and Housing Directorate as a Senior Architect, and worked there until September 2020. Then he moved to the UNESCO Kabul office, which started a project in Bamiyan on Landscape Preservation Special Plan and Management Plan for Archeological sites. He worked there as Urban Planner from 2020 to 2021.

Contact: a.rahim_ahmadi@yahoo.com



Amnesty International



Amnesty International is a global movement of more than 10 million people who are committed to creating a world where everyone can enjoy the human rights enshrined in the Universal Declaration of Human Rights and other international human rights mechanisms. To achieve this vision, our mission is to undertake research and action focused on preventing and ending grave abuses of these rights. Our core values are rooted in our commitment to the global community of human rights defenders that make up our membership: international solidarity,

effective action for the individual victim, global coverage, universality and indivisibility of human rights, impartiality and independence, democracy and human rights. United by our shared humanity, we know that the power to create positive change is within all of us. We are independent of any political ideology, economic interest or religion.

Contact: info.eseaprobangkok@amnesty.org

Alon Arad

Alon Arad is the Executive Director of Emek Shaveh. Alon holds a Bachelor's degree in archaeology and History from Tel Aviv University. Between 2013-2019 Alon worked in various archaeological projects in Israel, among them Tel Bet Yerah, Ramat Bet Shemesh, Beit She'arim and Mikveh Israel rubbish project. Emek Shaveh is an Israeli NGO working to defend heritage rights. We monitor ways in which heritage sites in Israel and the occupied territories are being used to limit land uses, displace individuals and communities and disconnect them from their land and heritage. We work to challenge discriminatory policies and advocate for a shared heritage approach to the sites and monuments in Israel and Palestine.

Contact: alon@emekshaveh.org



Noni Austin



Noni Austin is a staff attorney in the International Program of Earthjustice. Previously, she practiced environmental, planning and native title law at Herbert Smith Freehills in Sydney, Australia, and clerked for a judge of the Land and Environment

Court of New South Wales, Australia. She earned a Masters of Environmental and Natural Resources Law at the University of Oregon, during which time she externed for the Western Environmental Law Center and Environmental Law Alliance Worldwide.

Contact: naustin@earthjustice.org

I Gede Yudha Bhis Maya

I Gede Yudha Bhis Maya (29) is the Data and Archive Officer at Photovoices International. He graduated from Udayana University with a major in International Relations. He is an avid photographer who's been



actively involved in using camera as a tool for community development in rural communities in Bali, Lampung and Aceh in Indonesia. He has also worked with AIESEC Warszawa, and other international initiatives focused on youth empowerment.

Contact: igyudha.93@hotmail.com

Ibrahim Canbulat

Ibrahim Canbulat (76) is a conservation architect, hotelier, cook and writer with a Masters of Architecture. In 1972, he worked in the team that designed the Gaziantep Campus Plan Faculty of Architecture. He has held various positions at the Department of Architecture of the Middle East Technical University (1973-1982) and at Karabük University. From 1992-2006 he worked as an independent consultant in Turkey's transportation, automotive and energy sectors. Since 2006, he has been a hotelier in the mansions which he restored in Safranbolu. He was granted an award for Best Conservation and Revitalization Project in 2006 by the Turkey Chamber of Architects for the restoration of the Macunağası İzzet Efendi House. and for Best Kitchen in the Black-Sea Region of Turkey in 2015 by the Government of Konya. He continues to publish about Ottoman Houses and Turkish cuisine.

Contact: mhicanbulat@gmail.com



Juanjo Carmona

Juanjo Carmona has been a lawyer and environmental consultant since 1999. In 1996, he started volunteering in Doñana through WWF Spain, so he lived through one of its blackest moments, the Aznalcóllar mining catastrophe. In 2001, he was hired for

WWF's Doñana office, located in Hinojos, where he lives. Since then he has been working to conserve Doñana in close collaboration with local communities, NGOs, businessmen, farmers and administrations. When talking about Doñana and its OUV, its beaches, lagoons, marshes, forests, dunes, lynx or imperial eagles, for him it is talking about his home and people.

Contact: donana@wwf.es

Jimmy Cordwell



Jimmy Cordwell is a Wilderness Campaigner with the Tasmanian branch of the Wilderness Society, a non-government organisation that has led conservation campaigns in Tasmania and across Australia since 1976. A wilderness tragic, Jimmy has worked across government, private, and NGO sectors

focusing on wilderness conservation, he is studying wilderness at the University of Tasmania, and he spends his spare time hiking and photographing the depths of his iconic backyard - the spectacular Tasmanian Wilderness World Heritage Area. Jimmy joined the Wilderness Society's campaign team in 2020.

Contact: jimmy.cordwell@wilderness.org.au

Jane da Mosto

Jane da Mosto (MA University of Oxford, MSc Imperial College London) is an environmental scientist and activist based in Venice, and the co-founder and executive director of the non-profit association We are here Venice WahV). Operating across many different disciplines, WahV has a mission to change the future of the city, highlighting the need to protect the lagoon and rebuild a more resilient resident population. Jane's books include



The Science of Saving Venice (Umberto Allemandi, 2004), The Venice Report (Cambridge University Press, 2010) and Acqua in Piazza (Linea d'acqua 2016). Alongside WahV's specific projects, Jane is active in the community and is President of Pan di Zenzero, a pedagogical project for early childhood. In 2017 she was

honoured with the Osella d'Oro by the city of Venice and in 2021 she received the Fondazione Masi Prize for "vision and courage".

Contact: jane@weareherevenice.org

Deutsche Umwelthilfe

 Deutsche Umwelthilfe (Environmental Action Germany) is a politically independent non-profit environmental and consumer protection organization that was founded in 1975. Its work covers mainly climate protection and marine conservation, and it is active primarily at the national and European level. DUH's Energy & Climate Protection Department has an open climate case in court against Germany's biggest oil and gas company, Wintershall Dea, since October 2021.

Contact: winkler@duh.de

Wiwik Dharmiasih



Wiwik Dharmiasih (38) is a lecturer at the Department of International Relations, Universitas Udayana, in Bali, Indonesia. She provided social and legal analysis for the World Heritage nomination of the Balinese irrigation system, subak, (2010-2011) and was the Coordinator for Program and Planning Unit at the Governing

Assembly for Bali's Cultural Heritage (2012). She was involved in the establishment of Forum Pekaseh Catur Angga Batukau and helped design the monitoring and evaluation system of the management of World Heritage property in Bali under the Subak Research Center, Universitas Udayana (2014). She is currently active in supporting community participation and youth involvement in the management of Bali's Cultural Landscape. She recently facilitated a photovoices community engagement initiative in Subak Jatiluwih to elicit local perspectives on the future management of the site.

Contact: wiwikd@gmail.com



Ni Luh Emi Dwiyantri

Ni Luh Emi Dwiyantri (24) served as the field facilitator of the Photovoices International initiative in Subak Jatiluwih, Bali. She is a local resident of Jatiluwih and recently graduated with a degree in tourism management from Politeknik Negeri Bali. She is an

active member of youth initiatives in Jatiluwih and works to enhance local participation and raise awareness on management of the World Heritage Site.

Contact: emidwiyantri967@gmail.com

Talya Ezrahi

Talya Ezrahi is the International Advocacy Manager for Emek Shaveh. Emek Shaveh is an Israeli NGO working to defend cultural heritage rights. We monitor ways in which heritage sites in Israel and the Occupied Palestinian Territories are being used to limit land uses, displace individuals and communities and disconnect them from their land and heritage. We work to challenge discriminatory policies and advocate for a shared heritage approach towards the ancient sites and monuments in Israel and Palestine.

Contact: talya@emekshaveh.org



Samah Jazi Faisal Al Khasoneh

Samah Jazi Faizal Al Khasoneh is a training manager at Sela for Training and Protection of Heritage. She is a conservator who leads the training department at Sela to build local capacity to preserve cultural heritage in Jordan. Samah volunteered in the Mora Sample

Collection project at ICCROM Rome, has been involved in different UNESCO projects all around Jordan, and is currently managing the training component of Sela's projects in Petra.

Contact: trainatsela@gmail.com



Henning Frase



Henning Frase is a Graduate Engineer (University of Applied Sciences) and works as a freelance architect and expert for damage to buildings, mainly in Berlin and Lower Saxony. Through years of work as an architect as well as an expert in the field of recording structural damage and the associated restoration and repair

of structural facilities, he is closely associated with the city of Goslar and has known the development of the city for decades.

Contact: h.frase-architekt@email.de

Atsbha Gebreegziabher



Currently, Atsbha Gebreegziabher is the head of the Tigray Culture and Tourism Bureau. He has been an Assistant Professor in Tourism Management at Mekelle University, Tigray, since 2009 with research interest focusing on heritage tourism, sustainable tourism, cultural tourism, tourism economics, tourism entrepreneurship, appraisal of tourism sustainability, hospitality studies, tourist satisfaction nexus loyalty, destination development, and related topics. He has received a PhD in philosophy from the Punjabi University, India, and also served as a Visiting Assistant Professor at the University of Girona. Since 2015, Atsbha Gebreegziabher has volunteered in running a heritage conservation project in the Dejen Wereda of Ethiopia.

Contact: atsbita12@gmail.com

Andy Gheorghiu

Andy Gheorghiu works as a full-time freelance campaigner, consultant, and activist for climate and environmental protection. During the last decade, he co-authored several reports about the negative climate impact of gas and fracking. Andy collaborated with grassroots groups, NGOs, scientists, attorneys and political decision makers to introduce several fracking bans and moratoria in Europe and beyond. He also contributed to the final session of the Permanent Peoples' Tribunal on Fracking, Human Rights and Climate Change. Andy currently supports and is a member of the Saving Okavango's Unique Life (SOUL) Alliance.

Contact: andy.gheorghiu@mail.de





Teresa Gil

Teresa Gil is a Spanish biologist with 20 years of professional experience in Natura 2000-Protected Areas management and habitats and flora conservation. Since April 2019, she has been the Head of the WWF-Spain Freshwater Programme.

WWF-Spain's origin is closely linked to Doñana. Over the last 50 years, WWF has been fighting to ensure the preservation of its OUV, trying to stop the illegal theft of water that is degrading outstanding aquatic ecosystems like Doñana National Park, and promoting marshland restoration in the Guadalquivir Estuary as a way to restore some of the losses of the past and giving a green economic alternative to intensive agriculture and tourism. Teresa is a member of several NGOs like WWF, SEO Birdlife, Territorios Vivos and SEBICOP. She is member of the IUCN WCPA (World Commission on Protected Areas) and EAGL-Spain.

Contact: tgil@wwf.es

John D. Grainger

Dr John D Grainger is a semi-retired consultant specialising in the establishment and management of protected areas for biodiversity conservation. He has worked in 12 countries, mainly in the Middle East, as a project team leader or senior policy adviser for biodiversity conservation initiatives. From 1996 until 2002 he was the International Project Manager for the EU funded project to establish and develop the St Katherine Protectorate in South Sinai, Egypt and was closely involved in the nomination of the St Catherine Area as a World Heritage Site. He is a founder member of Nature Conservation Egypt, a civil society NGO which undertakes advocacy and practical work for biodiversity conservation in Egypt, and also the ex-president and life member of the Saudi Arabian Natural History Society.

Contact: jeagrainger@yahoo.co.uk



Green Salvation



The Ecological Society "Green Salvation" was founded in 1990 and is registered as a public organization of the city of Almaty. Green Salvation's goal is to protect the human right to a healthy and productive life in harmony with nature, and to foster improvements to the socio-ecological situation in the Republic of Kazakhstan. The main Areas of Green Salvation's activities include:

1. Defending the Human Right to a Favourable Environment.
2. Participation in the Development of Environmental Protection Legislation.

3. Environmental Awareness and Education. | 4. Environmental Actions. | 5. Collection of Data on the Environmental Situation in the Republic of Kazakhstan.

Contact: gsalmaty@gmail.com

Fritz Groothues

Fritz Groothues studied in France and Germany and after two years as a social researcher in Ghana he moved to the UK in 1974. He spent most of his working life in the BBC World Service, first as a producer, then as Head of Strategy Development.

Contact: fritzgroothues@yahoo.com



Alice Hardinge



Alice Hardinge is a BA in Environmental Law which she received from the University of Tasmania. She has been a fundraiser and campaigner for the Wilderness Society Australia from 2019- 2022 before she joined The Wilderness Society Tasmania in 2023 and serves the organization now as a campaigns manager. The Wilderness Society is an independent, community-based, not-for-profit environmental advocacy organisation. Our vision is to transform Australia into a society that protects, respects and connects with the natural world that sustains us. We are committed to protecting, promoting and restoring wilderness across the continent for the survival and ongoing evolution of life on Earth. From community activism to national campaigns, we seek to give nature a voice to support the life that supports us all. We are powered by more than 150,000 supporters from all walks of life.

Contacts: alice.hardinge@wilderness.org.au

André Ilha

André Ilha, 64, has been a dedicated rock climber since the early 70's, and an environmental activist since the late 80's. On April 1990, along with seven other Rio de Janeiro climbers, he founded Grupo Ação Ecológica (GAE), an NGO devoted to preserve nature and, as an extension, the cultural heritage associated with it. In three separate occasions he served as president of Rio de Janeiro State Forest Institute (IEF), and for over than five years he was the director of Biodiversity and Protected Areas of Rio de Janeiro State Environment Institute (INEA). Now retired, he is still deeply involved in GAE's major causes as a volunteer. GAE was recently invited to be the Focal Point of WHW for the WHSite of Rio de Janeiro Cultural Landscape.

Contact: andresilha@gmail.com



Sharif Jamil

Sharif Jamil is an internationally recognized leader and activist in the global environmental movement. For more than two decades he has been organizing civic action for environmental justice in Bangladesh. He is a Council Member of Waterkeeper Alliance and the Coordinator of Waterkeepers Bangladesh. Sharif is currently serving as the General Secretary of the civil society initiative, Bangladesh Poribesh Andolon (BAPA). He was declared a Waterkeeper Warrior in the world on the eve of the 20th anniversary of the organization in 2019. He has been organizing grassroots movements against dirty industries and promoting global campaign against climate change. He is a founding member of the National Committee for Saving the Sundarbans (NCSS) and working in the global campaign for the Sundarbans World Heritage Site and promoting renewable energy in Bangladesh.



Contact: jamilenv@gmail.com



Sultana Kamal

Sultana Kamal is the Convener of the National Committee for Saving the Sundarbans (NCSS), a coalition of more than 50 civil society and non-governmental organizations of Bangladesh having shared interest in the environment, is concerned

that the Government of Bangladesh continues to disregard the 2017 decision of the World Heritage Committee (WHC) 41COM 7B.25 to protect the outstanding universal values (OUV) of the Sundarbans Bangladesh World Heritage site.

Contact: bapa2000@gmail.com

Masami Mel Kawamura

Masami Mel Kawamura is the Director of the Informed Public Project (IPP) in Okinawa, Japan. IPP engages in research and advocacy regarding environmental contamination related to the U.S. military bases in Okinawa. Her research utilizing the Freedom Information Act has helped reveal the contamination of former and present U.S. military bases in Okinawa, including the UNESCO World Natural Heritage Yambaru Forest. Masami holds a Ph.D. in International sociology from Hitotsubashi University, and she teaches as an adjunct lecturer at the University of the Ryukyus and Okinawa International University. She is a member of the IUCN Commission on Ecosystem Management.

Contact: director@ipp.okinawa



Salman Khairalla

Together with Toon Bijnens, Salman Khairalla is the coordinator of the international campaign 'Save the Tigris' (www.savethetigris.org), which is a network of over 15 civil society organisations from Iraq, Iran, Turkey, Syria and other countries with the

aim to advocate for the preservation of heritage in the Tigris-Euphrates basin. Particularly, Save the Tigris has been advocating for the protection of the natural heritage of the marshlands in Iraq through advocacy with stakeholders, research and awareness activities. Through their campaign members Un Ponte Per and Humat Dijlah, Bijnens and Khairalla are also coordinating 'Sumereen', a major UNDP-supported project to develop the natural and cultural heritage of the Ahwar through the construction of infrastructure, training and livelihood support.

Contact: salman.khairalla@gmail.com

Wilson K. Kipkazi

Wilson Kipsang Kipkazi is the Executive Director of the Endorois Welfare Council, a representative body formed in 1995 by the Endorois community and an organisation that has long been involved in working to improve respect for the rights of the Endorois in the management of their ancestral lands, including the area of Lake Bogoria, now incorporated into the Kenya Lakes System World Heritage Site. Besides Lake Bogoria, the Endorois Welfare Council is active in various other fields such as education, community and economic development, gender mainstreaming, fundraising and inter-tribal conflict management and peace-building. Mr. Kipkazi has also been the chairman of the National Council of NGOs in Kenya since 2014.

Contact: kipkaziwk@gmail.com



Aleksandra Koroleva



Aleksandra Koroleva is co-chair of the Russian NGO Ecodefense. After declaring Ecodefense a foreign agent and initiating 5 criminal cases against her, she sought political asylum in Germany where she now lives. From 2006-2009, she served as Deputy Director of the Curonian Spit National Park and is the author of books and articles on the Curonian Spit. Since 2018, she has been the head of the project "Monitoring of regional phenomena of global climate change in the Curonian Spit", funded by the Heinrich Boell Foundation.

Contact: ecosasha@gmail.com

Evelina Kravchenko

Evelina Kravchenko is Senior research fellow at the Institute of Archaeology of the National Academy of Sciences of Ukraine. She has a diploma of specialist in history from the Ivan Franko Lviv National University (1998), a master degree from the National University of the Kyiv-Mohyla Academy (2002) and a PhD in archaeology (Candidate in historical science) from the Institute of Archaeology of the National Academy of Sciences of Ukraine (2008). She conducted her own excavations and worked in several international projects in Crimea from 2001 to 2014, such as the project of the Institute of Classical Archaeology of Texas University in Chersonesos. For the last 10 years she has worked in Kyiv with material of her previous excavation, other material from Ukrainian archaeological sites, and monitors the archaeological heritage in occupied Crimea.

Contact: evekravchenko@gmail.com



Aline Kühl-Stenzel

Aline is Policy Officer for Marine Conservation at NABU (Nature and Biodiversity Conservation Union), one of Germany's leading non-governmental organizations for nature conservation, with more than 940,000 members. She has 20 years of experience in conserving nature on land and in the ocean, which she has pursued by serving different environmental UN treaties, in academia and from an NGO perspective. Aline holds an honorary professorship in international environmental policy at the Eberswalde University for Sustainable Development.

Contact: aline.kuehl-stenzel@nabu.de



Zoltán Kun

Zoltán Kun studied forestry, gained an MSc degree on landscape architecture, and a professional engineering level on soil sciences. He has worked in both the civil society sector and also in the for-profit sector as a nature conservation expert. He is a research fellow of the Wildland Research Institute and currently serves as Head of Conservation of the Wild Europe Initiative. Zoltan Kun is a member of the IUCN's World Commission on Protected Areas and serves in various specialist group of WCPA as well as in two IUCN Task Forces about Primary Forest and Rewilding. His main focus of expertise includes the following topics: protected area management effectiveness, old-growth forests and their importance for biodiversity and climate change, wilderness protection across Europe.

Contact: zoltankun71@yahoo.com

Awad Abdalla Masaoud

Awad Abdalla Masaoud is an electronic systems and digitisation engineer, researcher and activist in the field of cultural heritage and cultural rights. He has worked with the British Cultural Protection Fund, King College London, and the Sudan Memory Project. He is also the co-founder and executive director of the Cultural Relief Foundation initiative that aims to monitor and protect cultural heritage sites in Sudan.

Contact: sdculturalrelief@gmail.com



Vanesa Menéndez Montero

Vanesa Menéndez Montero (Madrid, 1994) is an Assistant Professor in Public International Law and EU Law at the Autonomous University of Madrid. She is an expert on international cultural heritage law and its intersections with human rights, international criminal law and the environment. Her doctoral thesis addressed the international legal protection of immovable cultural heritage in peacetime. She is an active member of ESACH, Europa Nostra and the Young Professionals and Researchers Working Group of Future for Religious Heritage. She further collaborates with local NGOs to address cultural heritage issues.

Contact: vanesa.menendez.montero@gmail.com

Helen Methodiou



Helen Methodiou, archaeologist, is currently scientific associate at UNESCO Chair of Ionian University on Threats to Cultural Heritage. She combines experience in field archaeology, museology and on international organizations related to the protection of cultural heritage (UNESCO, ICOMOS, ICOM, ICCROM). She has worked in the Ministry of Culture for many years conducting excavations in important archaeological sites around Greece, supervised projects on protection and presentation of monuments and sites as well as on the foundation and operation of museums. She served also at the Permanent Delegation of Greece to UNESCO, and as elected vice chair of the World Heritage Committee contributed to the international dialogue on the protection of World Monuments and the promotion of Greek Monuments (inscription of Vergina, Mycenae, Tiryns and Patmos on the WHL). She is a member of the Greek National Committees of ICOMOS and ICOM.

Contact: e.methodiou@gmail.com

Alejandro Olivera

Alejandro Olivera is the Mexico Representative of the Center for Biological Diversity. He works to conserve Mexican wildlife, including highly endangered vaquita porpoises and loggerhead sea turtles. He is a marine biologist from the University of Baja California Sur and has a master's degree in the use, management and preservation of natural resources as well as a diploma in environmental law. He comes to the Center after years of work at the Mexican Center for Environmental Law (Cemda) and Greenpeace México. He is a petitioner for "in danger" designation of two World Heritage Sites in Mexico: The Islands and Protected Areas of the Gulf of California and Reserva de la Biósfera El Pinacate y Gran Desierto de Altar.

Contact: aolivera@biologicaldiversity.org



Frank Petersen



Frank Petersen works with the Dutch NGO "Waddenvereniging" to promote and protect the natural beauty of the Wadden Sea. The Waddenvereniging is an independent organization with no formal or financial ties to the Dutch government and has approximately 50,000 members. In 2016 the Wadden Sea was chosen as "the most beautiful natural

landscape in the Netherlands" and has been a World Heritage property since 2009. Waddenvereniging aims to convince both the public and the private sector that conservation of this unique natural environment is best done without new or ongoing mining projects underneath the boundaries of this World Heritage property.

Contact: petersen@waddenvereniging.nl

Braya Quilty

Braya Quilty is a graduate of Resource and Environmental Management at Simon Fraser University in Vancouver, British Columbia. Braya has worked with FCMN for the last 1.5 years as the Lands and Regulatory Coordinator, within the Lands and Regulatory Department. Her professional passions lie in Indigenous governance and Indigenous rights to land, water, and cultural way of life. She supports the LRD team on files pertaining to impact assessment and community engagement.

Contact: braya.quilty@fortchiptetis.ca



Herbert Rasinger

Herbert Rasinger has been the chairman of the Cityscape Protection Initiative (Initiative Stadtbildschutz), based in Vienna, Austria since 2015. He is active in cultural heritage site (last atelier of Gustav Klimt) and city protection matters (Wien Mitte, Vienna ice skating ring). He is a graduate of the Vienna Technical University and of a high school in Wilmington, Delaware, USA.

Contact: i-stadtbildschutz@aktion21.at



Hans-Ulrich Rösner



Hans-Ulrich Rösner is a biologist and ornithologist and has been working for the protection of the Wadden Sea since 1984. Since 1986 he worked for the global nature conservation organisation World Wide Fund for Nature (WWF). He is head of the Wadden Sea office of WWF Germany, focusing with his team on more sustainability

in sectors such as fisheries, tourism, energy, shipping and coastal defence. The focus is also on climate adaptation, public information, education, and on support for the National Parks and the Wadden Sea World Heritage. He is serving also as an advisor to the Wadden Sea Board, which represents the Trilateral Cooperation on the Protection of the Wadden Sea.

Contact: hans-ulrich.roesner@wwf.de

Maria Elena Ronza

Maria Elena is an architect and an archaeologist. Her career focuses on sustainable tourist development of archaeological and heritage sites through community engagement. Since 2011, she is involved in the management and conservation of the WHS site of Petra, first as Project Manager (2011–2014) and then as Project Co-director (2014–2017) with the American Center for Oriental Research's Temple of Winged Lions Cultural Resources Management Initiative. Subsequently, in 2015, she founded the non-for-profit company, Sela for Training and Protection of Heritage, aiming at building capacity within communities for a sustainable management of the Jordanian heritage. Currently, Sela is engaged with the Petra Development and Tourism Regional Authority in the maintenance of the WHS of Petra through the engagement of trained community members.

Contact: info@selajo.org



Isber Sabrine



Isber Sabrine (PhD) is a Syrian-Spanish archaeologist who specializes in cultural heritage management during conflicts. Since 2011, he has been involved in projects and studies on the protection of cultural heritage during conflicts. He is currently chair and co-founder of the international NGO Heritage for Peace. He is leading the Abuab Initiative, which is a social project that works on using cultural heritage as a tool for intercultural dialogue with refugees and immigrants from the MENA region and Ukraine. He is the founder and director of the Arab Network of Civil Society Organizations to Safeguard Cultural Heritage (ANSCH).

Contact: esper1985@yahoo.com

Gianluigi Salvador

Gianluigi Salvador (1942) studied statistics and demographics at the University of Padua and Rome. He worked for thirty years as a company inspector at IBM Italy on IT projects and quality management systems. He was a trade union delegate in the company and a municipal councilor in Carnate (Milan) for the Green party from 1990 to 1994. He was also at the same time in the Federal Council of the Greens of Lombardy. From 2002 to 2012 he was regional councilor of the WWF for energy and waste, and participated in the drafting of the national waste position of WWF Italy. In 2007 he participated in the foundation of the Movimento della Decrescita Felice (MDF), a movement inspired by Maurizio Pallante. Since 2014 he has been on the board of PAN Italia (Pesticide Action Network) with activities to stop the devastation caused by synthetic pesticides in monoculture vineyards in Veneto.

Contact: gianlu.cali@libero.it



Daniel Scarry



Daniel Scarry became engaged with Ohrid SOS, a local citizen initiative in the Republic of Macedonia, in 2015 after proposals were announced to drain the vital Studenchishte Marsh wetland and impose large-scale tourism infrastructure upon the Ohrid Region WHS. Fascinated by habitats, biodiversity and the interplay between them, he has co-authored two journal papers and several reports/articles related to socio-ecology, wetland protection, and natural heritage conservation in Macedonia.

Contact: dscar.ohridsos@gmail.com

Ute Scheub



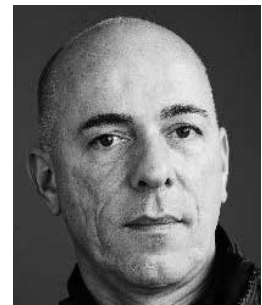
Dr. Ute Scheub has been the first ecology editor of the alternative daily newspaper "tageszeitung" (taz) and is a freelance journalist, author of 25 books and activist in Berlin. She sits on the three-member board of the Papageiensiedlung association, which was founded in 2010 and is committed to reconciling environmental protection and heritage conservation in the

Waldsiedlung Zehlendorf, also known as the Papageiensiedlung. She is also a founding member of kliQ - a climate-friendly neighborhood cooperative in the same neighborhood. The aim of the cooperative is to make the area climate-neutral as quickly as possible, using geothermal energy and solar systems, among other things. However, the kliQ project came into conflict with the plans of the State Monuments Office to regulate the Parrot Settlement with a "monument preservation plan" that is not very climate or citizen-friendly due to its subsequent nomination as a World Heritage Site.

Contact: scheub@posteo.de

Jörg Sicot

Jörg Sicot, Dipl.-Ing. Arch., age 55, is an architect and environmental activist. Born in Germany, raised in South Africa, having lived in Germany and France, he now works and lives in Malta. For 13 years he has been a committee member with Flimkien għal Ambjent Aħjar, a registered NGO on Malta whose remit



is to ensure the Quality of Life for All in both the built urban and natural environment. With a keen interest in architecture and design, his interests include reading, cinematography and social justice. Being fluent in German, English and Afrikaans his current work focus is on Interior Architecture and Design.

Contact: joerg.sicot@gmx.de

Eugene Simonov



Eugene Simonov is an environmental activist and expert. He is the International Coordinator of the Rivers without Boundaries Coalition (RwB) focusing on North Eurasian transboundary rivers. He collaborated with the WWF Amur Program to curtail three hydropower projects and designed a methodology for basin-wide environmental impact assessments of hydropower and analysis of the role of hydropower in flood management. He also works with the trilateral "Dauria" International Protected Area and the Sino-Russian Expert Committee on Biodiversity and Protected Areas. Since 2012, RwB has campaigned on hydropower projects sponsored by the World Bank and China Exim Bank. Since 2016 Eugene has worked with the Green Silk Road Coalition that pushes for more accountability and environmental sustainability of China's Silk Road Economic Belt integration initiative.

Contact: esimonovster@gmail.com

SOSOrinoco



The purpose of SOSOrinoco is to shed light on the existing body of work regarding the situation in the Amazonia and

Orinoquia regions of Venezuela, to raise awareness of the tragedy that is occurring and to outline some urgent measures that need to be taken in order to halt the unfolding human and environmental disaster. SOSOrinoco is an advocacy group started in 2018 by a group of experts inside and outside of Venezuela. They have been working anonymously, concealing the names of team members and witnesses, due to the high risk of doing this type of research in Venezuela. Their commitment has been to document and create an in-depth diagnostic of the region south of the Orinoco River and to raise awareness about the tragedy that is occurring, as well as to outline urgent measures that need to be taken in order to halt this disaster.

Contact: info@SOSOrinoco.org

Nevin Soyukaya



Nevin Soyukaya graduated from Atatürk University, Department of Archaeology. Between 1989 and 1994, she worked as the Culture and Art Director at the Diyarbakır Municipality. Between 1994 and 2013, she served as an Archaeologist and Museum Director at the Diyarbakır Museum. She served as the head of the Diyarbakır Castle and Hevsel Gardens Cultural Landscape Area Management during and after the UNESCO candidacy process. In 2017, she was dismissed from civil service by a decree-law. Simultaneously with her duties in the public sector, she participated in voluntary work and carried out projects in various NGOs, designating the cultural inventory of Mardin and Diyarbakır provinces. She has been running the Archive and Portal Project on Diyarbakır/Sur under the Diyarbakır Association for the Protection of Cultural and Natural Assets since 2018.

Contact: soyukaya@gmail.com

Yefta Sutrisno



Yefta Sutrisno (29) is a freelance researcher interested in social issues in Bali. He has been involved in Jatiluwih working with the local community since 2013. He is currently working on research project in Jatiluwih that is part of a multi-country study on "resiliency in indigenously engineered, yet vulnerable, rice farming landscapes."

Contact: yeftasutrisno@gmail.com

Tasos Tanoulas



Dr. Tasos Tanoulas is an architect who worked in the Greek Ministry of Culture from 1976-2016, at the Service for the Preservation of the Acropolis Monuments (1977-2010), and in charge of the Propylaia Restoration Project (1984-2010). After retirement, he was superintendent of the Restoration of the Propylaia South Wing (2013-2016). A member of Greek and international scientific institutions and committees, he published more than seventy articles in scholarly periodicals and volumes, on architectural history and theory from antiquity to date, and published several books on the Propylaia. He received the Europa Nostra Award for Conservation and the Europa Nostra Public Choice Award in 2013, as the leader of the Propylaia Restoration Project. In 2020, he founded the initiative Acropolis SOS.

Contact: atano1947@gmail.com

Francesco Vettore et al.



Francesco Vettore holds a MSc in Sciences and Management of Nature from the University of Bologna with a thesis on the analysis of the management and environmental threats of the natural WHS Aeolian Islands (Italy). He is currently working as consultant with the Science unit and Education team at the UNESCO Regional Bureau for Science and Culture in Europe in Venice. (<https://www.linkedin.com/in/francescovettore/>)

Claudia Romagnoli is Associate Professor in Stratigraphic geology and Sedimentology at the University of Bologna, Dip. di Scienze Biologiche, Geologiche e Ambientali (BiGeA), (<https://www.unibo.it/sitoweb/claudia.romagnoli>). Her research interests deal with marine and coastal geology; insular volcanoes; marine geohazard; seafloor and habitat mapping.

Pietro Lo Cascio is a MSc conservation biologist and president of Nesos (www.nesos.org), an association involved in biodiversity research, conservation projects and sustainable tourism development, based in Lipari Island. In 1999 he accompanied the IUCN mission to assess the Aeolian Islands' nomination for the World Heritage List.

Contact: francesco.vettore@studio.unibo.it

Carmen Wells

Carmen Wells is Metis originally hailing from British Columbia, Canada. She has been working with Indigenous communities for over 10 years in the Canadian Northern Alberta oilsands, and has held positions both with industry and government relations departments within various northern Alberta nations. She has been working for Fort Chipewyan Metis Nation (FCMN) since 2021 as the Lands and Regulatory (LRD) Director and leads all the government and industry files with her team. The LRD team manages projects and government policies that impact the environment, rights, and culture of the FCMN.

Contact: carmen.wells@fortchipmetis.ca



Günter Wippel



Günter Wippel holds a degree in economics and has worked on issues such as uranium mining and human rights since the 1980s. He was a co-organizer of the The World Uranium Hearing in Austria (1992) and has attended many conferences on the issue of uranium mining. In 2003, he co-founded a human rights group, MENSCHENRECHTE 3000 e.V., connecting human-rights violations and environmental destruction. This NGO has also worked for many years on the rights of indigenous peoples. In 2008, he initiated the working group "uranium-network.org" and co-organized international conferences on the impacts of uranium mining in Bamako / Mali (2012), in Tanzania (2013) and in Johannesburg / South Africa (2015). The NGO works with communities affected or threatened by uranium mining worldwide, focusing most recently on countries in Africa.

Contact: g.wippel@mail.de

Hideki Yoshikawa

Hideki Yoshikawa is the Director of the Okinawa Environmental Justice Project (OEJP) in Okinawa, Japan. OEJP engages in research, advocacy, and lobbying to protect Okinawa's Environment from the overwhelming presence of U.S. military bases in Okinawa. Hideki was trained as an anthropologist at U.S. and Canadian universities. For 15 years, he has been at the forefront of internationalizing Okinawa's military base-related environmental issues. His work has highlighted the controversial situations of the UNESCO World Natural Heritage Yambaru Forest and the U.S. military's Northern Training Area sitting next to the World Heritage Site.

Contact: yhidekiy@gmail.com





WORLD HERITAGE WATCH

Please support our work!

This report was made possible thanks to the great unpaid commitment of our staff, to whom we are very grateful. We do not have a secured budget for the WHW Report. If you find the information in it valuable, we kindly ask you to support our work with your donation. This is the only way to maintain our independent reporting on World Heritage.

Our account: IBAN: DE32 4306 0967 1159 5396 00, BIC: GENODEM1GLS

Paypal: World Heritage Watch
www.world-heritage-watch.org/content/donations/



Map of the properties covered in this volume